AI/AI/CO 1100375261S7

6EN-AA

TX157V.2

REGENCY
ENERGY PARTNERS

801 S. Loop 464
Monahans, TX 79756

RECEIVED
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Air Toxics & Inspection
Coordination Branch
6EN-A

January 29, 2015

Texas Commission on Environmental Quality
Region 7 Midland
9900 W. I-20
Ste.100
Midland, TX, 79706

Re: Annual Permit Compliance Certification and Deviation Report
Regency Field Services
Waha Gas Plant
RN100211408
CN603263823
PE-0024-Q

Attached, please find the July 1, 2014 -December 31, 2014 Permit Compliance Certification and Deviation Report for the above referenced facility.

Should you require any additional information concerning this submittal, please contact me.

REGENCY
ENERGY PARTNERS

Scott Heysquierdo
Environmental Specialist
432-210-9064
Scott.Heysquierdo@RegencyGas.com

cc: EPA Region 6

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION

A. RN: 100211408	B. CN: 603263823	C. Account No.: PE-0024-Q
D. Permit No.: 2546	E. Project No.:	
F. Area Name: Waha Gas Plant		
G. Company Name: Regency Field Services, LLC		

II. CERTIFICATION TYPE *(Please mark the appropriate box)*

A. ☐ Responsible Official:	B. ☒ Duly Authorized Representative:

III. SUBMITTAL TYPE *(Place an "X" in the appropriate box) (Only one response can be accepted per form)*

☐ SOP/TOP Initial Permit Application	☐ Update to Permit Application
☐ GOP Initial Permit Application	☐ Permit Revision, Renewal, or Reopening
☒ Other: Semiannual Deviation Report Permit Compliance Certification	

IV. CERTIFICATION OF TRUTH

This certification does not extend to information which is designated by the TCEQ as information for reference only.

I, Bart Collins, certify that I am the DAR for this application
(Certifier Name printed or typed) *(RO or DAR)*

and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period in Section IV.A below, or on the specific date(s) in Section IV.B below, are true, accurate, and complete:

Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).

A. Time Period: From 07/01/2014 to 012/31/2014
*Start Date** *End Date**

OR

B. Specific Dates: _____ _____ _____ _____ _____ _____ _____ _____
*Date 1** *Date 2** *Date 3** *Date 4** *Date 5** *Date 6** *Date 7** *Date 8**

**The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'*

Signature: Bart Collins Signature Date: 01/29/15

Title: Regional Director

Texas Commission on Environmental Quality
Federal Operating Permit Form
Permit Compliance Certification – PCC (Part 1)

Permit Holder Name	Regency Field Services LLC	**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant	**Account Number**	**PE-0024-Q**
Operating Permit Number	**O - 2546**	**Report Submittal Date**	**1/29/2015**
Certification Period Start Date	**7/1/2014**	**End Date**	**12/31/2014**

I. Certification of Continuous Compliance with Permit Terms and Conditions **(Indicate response by placing a 'x' in the appropriate column for each of the following questions)**	**Response:** Yes	No
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?	☒	☐

II. Summary of Deviations **(Indicate response by placing a 'x' in the appropriate column for each of the following questions)**	**Response:** Yes	No
A. Were there any deviations from any permit requirements during the Certification Period that have *previously* been reported to the agency? If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal. *Important Note:* If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.	☒	☐
B. Were there any deviations from any terms or conditions of the permit during the Certification Period that are *currently* being submitted to the agency? If the answer to this question is 'Yes', please include the relevant reports along with this page.	☒	☐

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Regency Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	07/01/2014	**Report Period End Date**	12/31/2014	**Operating Permit Number**	**O-2546**	**Report Submittal Date**	01/29/2015

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	**Group ID**							
FLARE 70		2.F	SO2, H2S, NOx, VOC	101.201	Report	60A-001		

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	See Attch.	7/1/14	12:00a	12/31/14	12;00a	56	See Attachment	See Attachment
				Total Deviations:		**56**	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

TCEQ-10101 [04/09]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Form
PCC - Previous Deviation Reports (Part 2)

Permit Holder Name	Regency Field Services LLC	**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant	**Account Number**	**PE-0024-Q**
Operating Permit Number	**O-2546**	**Report Submittal Date**	**1/29/2015**
Certification Period Start Date	**07/01/2014**	**End Date**	**12/31/2014**

Identification of Deviation Reports Submitted During the Certification Period

(Note: All reports must be certified to truth, accuracy, and completeness by the Responsible Official)

Report Date	Report Description (Name of unit, Name of Rule, Driver for report, etc)	Report Submitted To	Report Previously Certified? (Y/N)
7/9/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 200841	Region 7	N
7/20/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 201230	Region 7	N
7/21/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 201279	Region 7	N
7/24/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 201478	Region 7	N
7/25/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 201477	Region 7	N
7/25/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 201480	Region 7	N
7/26/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 201492	Region 7	N
7/27/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 201513	Region 7	N
7/28/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 201561	Region 7	N
7/30/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 201705	Region 7	N
8/6/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 201917	Region 7	N
8/7/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 202015	Region 7	N
8/14/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 202362	Region 7	N
8/21/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 202628	Region 7	N
8/22/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 202755	Region 7	N
8/23/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 202756	Region 7	N
8/23/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 202760	Region 7	N
8/24/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 202761	Region 7	N

8/24/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 202697	Region 7	N
8/25/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 202744	Region 7	N
8/26/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 202747	Region 7	N
8/31/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 202984	Region 7	N
9/6/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 203969	Region 7	N
9/9/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 203408	Region 7	N
9/11/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 203413	Region 7	N
9/17/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 203755	Region 7	N
9/18/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 203776	Region 7	N
9/18/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 203796	Region 7	N
9/22/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 203959	Region 7	N
9/23/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 204056	Region 7	N
9/27/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 204308	Region 7	N
9/30/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 204473	Region 7	N
10/6/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 204741	Region 7	N
10/12/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 204999	Region 7	N
10/13/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 205178	Region 7	N
10/14/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 205179	Region 7	N
10/23/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 205532	Region 7	N
10/28/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 205538	Region 7	N
10/23/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 205588	Region 7	N
10/26/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 205640	Region 7	N
11/4/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 206065	Region 7	N
11/5/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 206152	Region 7	N
11/6/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 206153	Region 7	N
11/6/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 206171	Region 7	N
11/8/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 206226	Region 7	N
11/9/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 206231	Region 7	N
11/9/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 206249	Region 7	N
11/11/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 206298	Region 7	N

11/12/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 206313	Region 7	N
11/13/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 206370	Region 7	N
11/23/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 206733	Region 7	N
12/4/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 207105	Region 7	N
12/4/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 207054	Region 7	N
12/22/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 207759	Region 7	N
12/23/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 207792	Region 7	N
12/29/2014	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 207868	Region 7	N

WAHA AGI Stream H_2S,SO_2, NO_X, CO and VOC Calculation Sheet

STEERS Incident Number	event #	Date Down	Down Time	Date on	On Time	Total Time (hrs)	Gas Volume (mmscf)	Emissions (lb)					Cause of Flare Event	Corrective Action Taken
								H_2S	SO_2	NO_X	CO	VOC		
200841	438	7/9/2014	3:30pm	7/9/2014	8:30pm	5hr	0.1112	20.21	1883.17	3.45	29.65	7.55	Plant shutdown on high cryo plant inlet temperature	False reading. Restart plant. Mechanical switch failure, rewire Temp xmtr to DCS.
201230	440	7/20/2014	2:30pm	7/21/2014	2:50am	12 20m	0.399	72.52	6757.05	12.39	106.37	27.10	5th stage rod load and power outage	Restart compressor afterr powe outage
201279	441	7/21/2014	9:15am	7/21/2014	8:00pm	11hr 45 min	0.4267	77.55	7226.15	13.25	113.76	28.98	Scubber would not drain due to valve malfunction	Shut valve and restart compressor
201478	442	7/24/2014	4:40pm	7/24/2014	8:00pm	3hr 20m	0.124	22.54	2099.93	3.85	33.06	8.42	High 5th stage rod load, temperature/pressure	Adjust set points on compressor
201477	443	7/25/2014	11:00am	7/25/2014	1:30pm	2hr 30m	0.1065	19.36	1803.57	3.31	28.39	7.23	High 1st stage scrubber level, bad switch	Level controller switch repaired, restart compressor
201480	444	7/25/2014	6:50pm	7/26/2014	1:30am	6hr 40m	0.3024	54.96	5121.13	9.39	80.62	20.54	High 5th stage rod load, temperature/pressure	Adjust set points on compressor
201492	445	7/26/2014	4:15pm	7/26/2014	8:00pm	3hr 45m	0.1686	30.64	2855.23	5.23	44.95	11.45	High 5th stage rod load, temperature/pressure	Adjust set points on compressor
201513	446	7/27/2014	3:00pm	7/27/2014	10:30pm	7hr 30m	0.303	55.07	5131.29	9.41	80.78	20.58	High 5th stage rod load, temperature/pressure	Adjust set points on compressor
201561	447	7/28/2014	5:30pm	7/28/2014	10:15pm	4hr 45min	0.2108	38.31	3569.89	6.54	56.20	14.32	High 5th stage rod load, temperature/pressure	Adjust set points on compressor
201705	449	7/30/2014	3:20pm	7/31/2014	3:50am	12hr 30m	0.2464	44.78	4172.77	7.65	65.69	16.73	3 recompressor shutdown on high oil temp, fan malfunction, lost plant, power outage	Bring plant online, restart compressor
201917	450	8/6/2014	7:40am	8/6/2014	9:20am	1hr 40m	0.084	15.27	1422.54	2.61	22.39	5.70	Low suction pressure due to plant upset	Line out plant and allow reflux drum pressure to reach adequate pressure to allow restart of compressor
202015	452	8/7/2014	4:15pm	8/7/2014	5:15pm	1hr	0.0522	9.49	884.00	1.62	13.92	3.54	5th stage rod load, temperature, pressure	Check setpoints, ambient temps high, cool down
202362	453	8/14/2014	9:00am	8/14/2014	3:30pm	6hr 30min	0.178	32.35	3014.42	5.53	47.46	12.09	AGI glycol skid maintenance	Reset and restart compressor after maintenance on the compressor
202628	455	8/21/2014	6:30pm	8/22/2014	1:30am	6hr 30min	0.1242	22.57	2103.32	3.86	33.11	8.43	Power Loss	Reset and restart unit after power was restored and plant lined out
202755	456	8/22/2014	1:45pm	8/22/2014	2:45pm	1hr	0.032	5.82	541.92	0.99	8.53	2.17	Maintenance activites on dehy skid	Place unit in service after maintenance activities were complete and equipment readied for service.
202756	457	8/23/2014	10:00am	8/24/2014	12:00am	15hr	0.4575	83.15	7747.74	14.20	121.97	31.07	4th stage scubber level, power outage, panel power board out due to weather	drain scubber, replace power board, restart after power was restored.
202760	458	8/23/2014											Report covered under 202756	
202761	459	8/24/2014	8:40am	8/24/2014	10:40am	2hr	0.0672	12.21	1138.03	2.09	17.92	4.56	Power loss	Reset and restart AGI once power was restored and plant lined out.
202697	460	8/24/2014	6:00pm	8/25/2014	11:00am	17hr	0.7547	137.17	12780.81	23.43	201.20	51.25	Power loss	Reset and restart AGI once power was restored and plant lined out.
202744	461	8/25/2014	2:55pm	8/25/2014	3:10pm	15min	0.0086	1.56	145.64	0.27	2.29	0.58	High 2nd stage scrubber level	Manually drain scrubber, check level controller, restart compressor
202747	462	8/26/2014	6:30am	8/26/2014	7:50am	1hr 20min	0.0444	8.07	751.91	1.38	11.84	3.02	High 4th stage scrubber level	Manually drain scrubber, check level controller, restart compressor
202984	465	8/31/2014	5:11pm	8/31/2014	6:03pm	52min	0.0367	6.67	621.51	1.14	9.78	2.49	High 1st stage suction temperature	Lowered set point on waste heat recovery units to lower amine still pressure
203969	466	9/6/2014	7:30pm	9/6/2014	8:20pm	50min	0.0303	5.51	513.13	0.94	8.08	2.06	High 4th stage scrubber level	drain scubber manually
203408	470	9/9/2014	2:30pm	9/9/2014	3:30pm	1hr	0.0343	6.23	580.87	1.06	9.14	2.33	Broken Tubing on 5th stage scrubber bottle	Repair tubing, reset and restart compresssor
203413	471	9/11/2014	2:00pm	9/12/2014	8:00pm	30hr 30min	0.7596	138.06	12863.79	23.58	202.51	51.59	Pull exchanger (chiller) for repair	Restart plant and compressor once chiller was repaired
203755	472	9/17/2014	8:55am	9/17/2014	9:45am	50min	0.0591	10.74	1000.86	1.83	15.76	4.01	Down on motor vibration	I&E Tech called to troubleshoot, false signal, no indication of vibration
203776	474	9/18/2014	10:30am	9/18/2014	11:45am	1hr 15m	0.0523	9.51	885.70	1.62	13.94	3.55	AGI taken offline to replace a switch on the still vent drum	Place AGI back in service after valve was replaced
203796	475	9/18/2014	6:20pm	9/18/2014	7:50pm	1hr 30min	0.0657	11.94	1112.63	2.04	17.52	4.46	Power outage	Reset and restart AGI once power was restored and plant lined out.
203959	476	9/22/2014	8:30am	9/22/2014	3:00pm	17hr 5min	0.396	71.97	6706.24	12.29	105.57	26.89	Lost recompressors due to plant upset/plant went sour	Line out plant and allow reflux drum pressure to reach adequate pressure to allow restart of compressor
204056	477	9/23/2014	9:50am	9/23/204	5:00pm	7hr 10 min	0.1251	22.74	2118.56	3.88	33.35	8.50	Recompressors shutdown-low suction pressure	Restart recompressor 4 line out plant, restart AGI compressor
204308	479	9/27/2014	6:40pm	9/27/2014	6:40pm	12hr 13m	0.2461	44.73	4167.69	7.64	65.61	16.71	Low/No Flow oil lubricator	Replace lubricator, change oil and filter, purge system, adjust lubricator flow rates.
204473	480	9/30/2014	6:45pm	9/30/2014	9:30pm	2hr 45m	0.08	14.54	1354.80	2.48	21.33	5.43	Broken Tubing Line 1st stage suction pressure	Repair tubing, restart compressor
204741	481	10/6/2014	6:50pm	10/6/2014	9:50pm	3hr	0.1151	20.92	1949.21	3.57	30.69	7.82	High 3rd stage dicscharge level	Checked poppet valves, all ok, reset and restart compressor
204999	482	10/12/2014	11:50am	10/12/2014	1:50pm	2hr	0.0692	12.58	1171.90	2.15	18.45	4.70	High 3rd stage discharge pressure due to faulty wire	Repaired wire on temperature probe
205178	483	10/13/2014	3:00am	10/13/2014	10:00am	8hrs	0.3137	57.02	5312.50	9.74	83.63	21.30	Low 1st stage suction pressure due to hot oil system, amine still temps and malfunctioning valve	Line out hot oil system and amine still temps, change solenoid on suction valve.
205179	484	10/14/2014	10:50pm	10/15/2014	12:50am	2hr	0.0805	14.63	1363.26	2.50	21.46	5.47	High 1st stage discharge pressure due to high temp in reflux drum,	Lowered temp in reflux drum, adjust set point on bypass to flare to allow startup
205532	485	10/23/2014	12:15am	10/23/2014	6:30am	6hr15min	0.27	49.07	4572.44	8.38	71.98	18.34	Low suction pressure during amine filter change out, difficulties restarting	Complete filter changeout, adjust setpoint on bypass valve, restart compressor
205538	486	10/28/2014	5:00am	10/31/2014	9:00am	76	0.9397	170.79	15913.78	29.17	250.53	63.82	Plant shutdown for maintenance activities	Restart compressor after plant was restarted and lined out
205588	487	10/23/2014	8:00pm	10/24/2014	2:30pm	17hrs	0.7859	142.84	13309.18	24.40	209.52	53.37	Shutdown manually due to elevated levels of H2S	Restart compressor after tubing was repaired
205640	488	10/26/2014	5:54pm	10/26/2014	8:45pm	2hr 51min	0.13	23.63	2201.54	4.04	34.66	8.83	Tubing line broke, AGI shutdown manually for repair	Restart compressor after tubing was repaired
206065	489	11/4/2014	2:30pm	11/4/2014	8:00pm	5hr 30min	0.218	39.62	3691.82	6.77	58.12	14.80	Low suction pressure, On startup the compressor would not continuously run	Restart compressor, I&E trouble shooting valve sequencing
206152	491	11/5/2014	4:50pm	11/5/2014	7:45pm	2hr 55min	0.0568	10.32	961.91	1.76	15.14	3.86	Plant shutdown on high regeneration temperature	Lower regen temp, restart plant, restart compressor
206153	492	11/6/2014	12:40am	11/6/2014	3:50am	3hr 10min	0.0984	17.88	1666.40	3.05	26.23	6.68	Low glycol circulation	Place additional glycol pump in service
206171	493	11/6/2014	8:00am	11/6/2014	3:30pm	7hr 30 min	0.2456	44.64	4159.23	7.62	65.48	16.68	Low glycol circulation	Bypass low glycol circulation auto shutdown alarm
206226	494	11/8/2014	2:25pm	11/8/2014	5:25pm	3hr 5min	0.1174	21.34	1988.16	3.64	31.30	7.97	Compressor manually shutdown to replace glycol system measurement meter	Replace meter, restart compressor
206231	495	11/9/2014	9:30am	11/9/2014	12:00pm	2hr 30min	0.1178	21.41	1994.94	3.66	31.41	8.00	High 1st stage suction pressure.	Open louvers on reflux condensor to reduce temperature
206249	496	11/9/2014	2:30pm	11/9/2014	5:30pm	3hr	0.153	27.81	2591.05	4.75	40.79	10.39	Hot valves on 5th stage cylinder	Changed the hot valves, reset and restart
206298	497	11/11/2014	10:34am	11/11/2014	11:34am	1hr	0.0358	6.51	606.27	1.11	9.54	2.43	High 1st stage suction temperature	Place second reflux cooler in service to lower temperature
206313	498	11/12/2014	4:20am	11/12/2014	10:20am	6hr	0.1534	27.88	2597.82	4.76	40.90	10.42	High 3rd stage discharge pressure due to faulty transmitter	Replace transmitter
206370	499	11/13/2014	4:15am	11/13/2014	10:15am	6hr	0.2882	52.38	4880.65	8.95	76.83	19.57	High 3rd stage discharge pressure and 4th stage suction due to faulty transmitter	Replace transmitter
206733	502	11/23/2014	1:00am	11/23/2014	2:05am	1hr 5min	0.0451	8.20	763.77	1.40	12.02	3.06	Panel malfunction	Pulled CAT 5 cable and reset panel
207105	505	12/4/2014	3:00am	12/4/2014	12:20pm	9hr 20min	0.386	70.16	6536.89	11.98	102.91	26.21	Uknown reason, no indication on panel, perform scheduled maintenance activities	Reset ethernet switch to PLC, restart compresser after PM
207054	506	12/4/2014					0	0.00	0.00	0.00	0.00	0.00	Incident 207105 preceeded this planned shutdown	
207759	511	12/22/2014	6:30am	12/22/2014	9:00am	2hr 30min	0.1049	19.07	1776.48	3.26	27.97	7.12	High 3rd stage scrubber level, high amine temperature	Reduced temperature on amine system
207792	512	12/23/2014	6:10pm	12/23/2014	11:13pm	5hr 3min	0.2701	49.09	4574.13	8.39	72.01	18.34	High second stage discharge pressure due to hot valves	change out 2nd stage valves
207868	517	12/29/2014	10:30am	12/29/2014	5:00pm	6hr 30min	0.283	51.44	4792.59	8.79	75.45	19.22	Shutdown AGI for maitenance on the scrubber dump system	Replace tubing on the scrubber dump system, restart compressor

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	Regency Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	07/01/2014	**Report Period End Date**	12/31/2014	**Operating Permit Number**	**O2546**	**Report Submittal Date**	01/29/2015

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	**Group ID**							
FLARE 70		2.F	SO2, H2S, NOx, VOC	101.201	Record	60A-001		

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	7/1/14	12:00a	12/31/14	12:00a	26	See Attached	See Attached
Total Deviations:					26	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

WAHA AGI Stream H_2S,SO_2, NO_X, CO and VOC Calculation Sheet

STEERS Incident Number	event #	Date Down	Down Time	Date on	On Time	Total Time (hrs)	Gas Volume (mmscf)	Emissions (lb)					Cause of Flare Event	Corrective Action Taken
								H_2S	SO_2	NO_X	CO	VOC		
Recordable	439	7/14/2014	5:30pm	7/14/2014	6:15pm	1hr 15m	0.029	5.27	491.11	0.90	7.73	1.97	Unit shut down, no indication on panel	troubleshoot panel, reset and restart compressor
Recordable	448	7/29/2014	11:30am	7/29/2014	11:50am	20m	0.013	2.36	220.15	0.40	3.47	0.88	I&E tech working on gycol skid tripped unit	restart unit
201974(Rec)	451	8/6/2014	3:55pm	8/6/2014	5:10pm	1hr 15m	0.029	5.27	491.11	0.90	7.73	1.97	5th stage rod load, temperature, pressure	Check setpoints, ambient temps high, cool down
Recordable	454	8/17/2014	11:45am	8/17/2014	12:10pm	25min	0.016	2.91	270.96	0.50	4.27	1.09	Low ist stage suction pressure	Reset and restart compressor, unit ran continuously
Recordable	463	8/26/2014	12:15pm	8/26/2014	12:25pm	10min	0.0053	0.96	89.76	0.16	1.41	0.36	Instrumetation work caused the unit to go down	Reset and restart unit
Recordable	464	8/28/2014	7:50pm	8/28/2014	8:20pm	30min	0.027	4.91	457.24	0.84	7.20	1.83	High5th stage scrubber level	Manually drain scrubber, reset and restart compressor
Recordable	467	9/7/2014	3:00pm	9/72014	3:20pm	20min	0.016	2.91	270.96	0.50	4.27	1.09	High 3rd stage scrubber level	drain scrubber manually
Recordable	468	9/8/2014	9:10pm	9/8/2014	9:20pm	10min	0.016	2.91	270.96	0.50	4.27	1.09	High 3rd stage scrubber level	drain scrubber manually
Recordable	469	9/8/2014	5:30am	9/8/2014	6:05am	35min	0.023	4.18	389.50	0.71	6.13	1.56	High 3rd stage scrubber level	drain scrubber manually
Recordable	473	9/17/2014	11:15am	9/17/2014	11:40am	25min	0.0222	4.03	375.96	0.69	5.92	1.51	Low 5th stage suction pressure due to glycol skid being placed in service	place unit back in service after glycol skid was complete
Recordable	478	9/25/2014	4:35pm	9/25/2014	5:35pm	1hr	0.0181	3.29	306.52	0.56	4.83	1.23	High 1st stage suction temperature-cooling fan vibration	Reset panel and restart compressor
Recordable	490	11/5/2014	10:00am	11/5/2014	10:30am	20min	0.0124	2.25	209.99	0.38	3.31	0.84	Contractor bumped open a valve bypassing the glycol meter	Close valve, restart compressor
Recordable	500	11/19/2014	12:00am	11/19/2014	12:25am	25min	0.01	1.82	169.35	0.31	2.67	0.68	Low 1st stage suction pressure due to pressure in reflux drum	Raised pressure in reflux drum
Recordable	501	11/20/2014	12:55pm	11/20/2014	1:22pm	27min	0.021	3.82	355.63	0.65	5.60	1.43	High 1st stage suction Temp due to pressure in reflux drum	Stabilized the reflux drum pressure
Recordable	503	11/29/2014	3:00pm	11/29/2014	3:30pm	30min	0.0145	2.64	245.56	0.45	3.87	0.98	Low ist stage suction pressure due to amine system fluctuation	Line out amine system, process adjustments
Recordable	504	12/2/2014	5:30pm	12/2/2014	6:00pm	30min	0.015	2.73	254.02	0.47	4.00	1.02	Low ist stage suction pressure due to amine system fluctuation	Adjust amine level control valve to amine surge tank
	506	12/4/2014					0	0.00	0.00	0.00	0.00	0.00	Incident 207105 preceeded this planned shutdown	
Recordable	507	12/16/2014	10:10am	12/16/2014	10:50am	40min	0.011	2.00	186.28	0.34	2.93	0.75	Communications error on dehy blower,	Placed blower pump in manual operation
Recordable	508	12/17/2014	10:20am	12/17.2014	10:40am	20min	0.009	1.64	152.41	0.28	2.40	0.61	Low suction pressure due to foaming in amine system	Reduce amine still temperature by reducing fuel to HO burners
Recordable	509	12/18/2014	3:20am	12/18/2014	3:45am	15min	0.0095	1.73	160.88	0.29	2.53	0.65	Low suction pressure due to foaming in amine system	Reduce amine still temperature by reducing fuel to HO burners
Recordable	510	12/22/2014	12:55am	12/22/2014	1:05am	10min	0.009	1.64	152.41	0.28	2.40	0.61	Low suction pressure due to sock filter change out	Replace sock filters and restart compressor
Recordable	513	12/24/2014	3:10am	12/24/2014	3:15am	5min	0.008	1.45	135.48	0.25	2.13	0.54	High second stage discharge pressure	Reset and restart compressor, no further issues
Recordable	514	12/27/2014	11:40am	12/27/2014	12:00pm	20min	0.007	1.27	118.54	0.22	1.87	0.48	High 3rd stage scrubber level	Reduce liquid level in scrubber, restart compressor
Recordable	515	12/28/2014	3:20pm	12/28/2014	3:35pm	15min	0.008	1.45	135.48	0.25	2.13	0.54	High 3rd stage scrubber level	Reduce liquid level in scrubber, I&E tech checked into level controller
Recordable	516	12/29/2014	2:00am	12/29/2014	3:00am	1hr	0.013	2.36	220.15	0.40	3.47	0.88	Low 1st stage suction due to amine system fluctuation	Line out amine system, process adjustments
Recordable	518	12/30/2014	9:30am	12/30/2014	10:00am	30min	0.023	4.18	389.50	0.71	6.13	1.56	High 2nd stage scrubber level	Check and drain scrubber, I&E Tech checked level controller
Recordable	519	12/31/2014	1:45pm	12/31/2014	2:00pm	15min	0.009	1.64	152.41	0.28	2.40	0.61	High 3rd stage scrubber level	Reduce scrubber level, reset and restart compressor

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	Regency Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	7/01/2014	**Report Period End Date**	12/31/2014	**Operating Permit Number**	**O2546**	**Report Submittal Date**	01/29/2015

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
FLARE 19			PM	111.111(a)(4)(A)	Monitor Report	514-04-004	Visible	Ongoing

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	07/1/14	12:00a	12/31/14	12:00a	1	Flare not operating under smokeless conditions at all times.	Flare project under development. New flare being designed for replacement of existing flare. Flare project ongoing.
Total Deviations:					1	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	Regency Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	07/01/2014	**Report Period End Date**	12/31/2014	**Operating Permit Number**	**O2546**	**Report Submittal Date**	01/29/2015

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
WAU26			NOX, CO, VOC	106.512	Monitor	64-CAM-0002	Permit	Daily

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	7/1/14	12:00am	7/10/14	23:59	10	Did not record data for O2 sensor voltage (millivolts)	Record millivolts as required. (Daily Readings.)
2	8/1//14	12:00am	8/3/14	23:59	3	Did not record data for O2 sensor voltage (millivolts)	Record millivolts as required. (Daily Readings.)
Total Deviations:					**13**	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	Regency Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	07/01/2014	**Report Period End Date**	12/31/2014	**Operating Permit Number**	**O2546**	**Report Submittal Date**	01/29/2015

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
WAU25			NOX, CO, VOC	106.512	Monitor	64CAM-0003	Permit	Daily

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	7/1/14	12:00a	7/9/14	23:59	9	Did not record data for O2 sensor voltage (millivolts)	Record millivolts as required. (Daily Readings.)
2	7/10/14	12:00a	7/23/14	23:59	14	Did not record data for O2 sensor voltage (millivolts)	Record millivolts as required. (Daily Readings.)
3	8/3/14	12:00a	8/5/14	23:59	3	Did not record data for O2 sensor voltage (millivolts)	Record millivolts as required. (Daily Readings.)
				Total Deviations:	**26**	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Regency Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	07/01/2014	**Report Period End Date**	12/31/2014	**Operating Permit Number**	**O-2546**	**Report Submittal Date**	01/29/2015

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
Flare 70 Flare 19	Flare 70 Flare 19			106.492 (1)(B)	Monitor			

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	N/A	7/1/14	12:00a	8/20/14	12;00a	2	Flare (flame) monitors not operating as required.	Test/Repair equipment as needed. Revise programming/communications to Delta V. Update alarm(s) on operations panel.
				Total Deviations:		2	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

AI/AI/CO

TX 157 Vol 2

1100375261 57

ENERGY TRANSFER

Regency Field Services, LLC

3001 W. 9th St
Fort Stockton, TX 79735

RECEIVED

JUL 30 2015

Air Toxics & Inspection
Coordination Branch
6EN-A

July 29, 2015

Texas Commission on Environmental Quality
Region 7 Midland
9900 W. I-20
Ste.100
Midland, TX, 79706

Re: Permit Compliance Certification and Semiannual Deviation Report
Regency Field Services
Waha Gas Plant
RN100211408
CN603263823

Attached, please find the January 1-June 30, 2015 Permit Compliance Certification and Deviation Report for the above referenced facility.

Should you require any additional information concerning this submittal, please contact me.

ENERGY TRANSFER

Scott Heysquierdo – Environmental Specialist
3001 W. 9th St. Fort Stockton, TX 79735 | 432-210-9064
Scott.Heysquierdo@EnergyTransfer.com

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION

A. RN: 100211408	B. CN: 603263823	C. Account No.: PE-0024-Q
D. Permit No.: 2546	E. Project No.:	
F. Area Name: Waha Gas Plant		
G. Company Name: Regency Field Services, LLC		

II. CERTIFICATION TYPE *(Please mark the appropriate box)*

A. ☐ Responsible Official:	B. ☒ Duly Authorized Representative:

III. SUBMITTAL TYPE *(Place an "X" in the appropriate box) (Only one response can be accepted per form)*

☐ SOP/TOP Initial Permit Application	☐ Update to Permit Application
☐ GOP Initial Permit Application	☐ Permit Revision, Renewal, or Reopening
☒ Other: Semiannual Deviation Report	

IV. CERTIFICATION OF TRUTH

This certification does not extend to information which is designated by the TCEQ as information for reference only.

I, Mike McCracken, certify that I am the DAR for this application
(Certifier Name printed or typed) *(RO or DAR)*

and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period in Section IV.A below, or on the specific date(s) in Section IV.B below, are true, accurate, and complete:

Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).

A. Time Period: From 01/01/2015 to 06/30/2015
*Start Date** *End Date**

OR

B. Specific Dates: _____ _____ _____ _____ _____ _____ _____ _____
*Date 1** *Date 2** *Date 3** *Date 4** *Date 5** *Date 6** *Date 7** *Date 8**

**The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'*

Signature: _____ Signature Date: 7.29.15

Title: Senior Director Operations

Texas Commission on Environmental Quality
Federal Operating Permit Form
Permit Compliance Certification – PCC (Part 1)

Permit Holder Name	Regency Field Services LLC	**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant	**Account Number**	**PE-0024-Q**
Operating Permit Number	**O - 2546**	**Report Submittal Date**	**7/30/2015**
Certification Period Start Date	**1/1/2015**	**End Date**	**6/30/2015**

I. Certification of Continuous Compliance with Permit Terms and Conditions **(Indicate response by placing a 'x' in the appropriate column for each of the following questions)**	**Response:** Yes	No
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?	☒	☐

II. Summary of Deviations **(Indicate response by placing a 'x' in the appropriate column for each of the following questions)**	**Response:** Yes	No
A. Were there any deviations from any permit requirements during the Certification Period that have *previously* been reported to the agency? If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal. *Important Note:* If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.	☒	☐
B. Were there any deviations from any terms or conditions of the permit during the Certification Period that are *currently* being submitted to the agency? If the answer to this question is 'Yes', please include the relevant reports along with this page.	☒	☐

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	Regency Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	01/01/2015	**Report Period End Date**	6/30/2015	**Operating Permit Number**	**O2546**	**Report Submittal Date**	07/30/2015

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
WAU26			NOX, CO, VOC	106.512	Monitor	64-CAM-0002	Permit	Daily

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	2/13/15	12:00am	2/14/15	23:59	2	Did not record data for catalyst inlet temperature.	Record catalyst inlet temperature as required. (Daily Readings.)
2	2/23/15	12:00am	2/23/15	23:59	1	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
3	6/3/15	12:00am	6/5/15	23:59	3	Did not record data for: O2 sensor voltage (millivolts)	Record millivolts as required. (Daily Readings.)
4	6/22/15	12:00am	6/23/15	23:59	2	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
Total Deviations:					**8**	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ **YES** ☐ **NO**

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	Regency Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	01/01/2015	**Report Period End Date**	6/30/2015	**Operating Permit Number**	**O2546**	**Report Submittal Date**	07/30/2015

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
WAU25			NOX, CO, VOC	106.512	Monitor	64CAM-0003	Permit	Daily

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	1/9/15	12:00a	1/9/15	23:59	1	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
2	7/13/15	12:00a	7/13/15	23:59	1	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
3	6/8/15	12:00a	6/9/15	23:59	2	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
4	6/20/15	12:00a	6/23/15	23:59	4	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
Total Deviations:					**8**	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ **YES** ☐ **NO**

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	Regency Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	1/1/2015	**Report Period End Date**	6/30/2015	**Operating Permit Number**	**O2546**	**Report Submittal Date**	07/30/2015

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	**Group ID**							
FLARE 19			PM	111.111(a)(4)(A)	Monitor Report	514-04-004	Visible	Ongoing

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	1/1/15	12:00a	6/30/15	12:00a	1	Flare not operating under smokeless conditions	Flare replacement project in progress.
Total Deviations:					1	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	Regency Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	01/01/2015	**Report Period End Date**	6/30/2015	**Operating Permit Number**	**O2546**	**Report Submittal Date**	07/30/2015

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	**Group ID**							
FLARE 70		2.F	SO2, H2S, NOx, VOC	101.201	Record	60A-001		

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	1/1/15	12:00a	6/30/15	12:00a	41	See Attached	See Attached
Total Deviations:					41	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

WAHA AGI Stream H_2S,SO_2, NO_X, CO and VOC Calculation Sheet

STEERS Incident Number	event #	Date Down	Down Time	Date on	On Time	Total Time (hrs)	Gas Volume (mmscf)	Emissions (lb)					Cause of Flare Event	Corrective Action Taken
								H_2S	SO_2	NO_X	CO	VOC		
Recordable	523	1/12/2015	4:10am	1/12/2015	5:00am	50min	0.016	2.91	270.96	0.26	4.27	1.09	Low inlet gas volumes due to field compression operability	Reset and restart AGI compressor when adequate inlet volumes were established by the field units
Recordable	528	1/16/2015	6:00 PM	1/16/2015	7:00pm	1hr	0.02	3.64	338.70	0.32	5.33	1.36	High liquid levels, 1st and 4th stage scrubbers	Reduce high liquied levels, reset restart AGI compressor. Work order written for I&E to check dump system
Recordable	532	1/19/2015	7:40am	1/19/2015	7:50am	10min	0.001	0.18	16.93	0.02	0.27	0.07	Temperature on amine still dropped, swinging the the suction pressure on the AGI	Established temperature on the amine still and placed AGI back in service.
Recordable	540	1/27/2015	2:50pm	1/27/2015	3:00pm	10min	0.008	1.45	135.48	0.13	2.13	0.54	High inlet suction temperature	Place additional fan in service to lower suction temp, place AGI compressor back in service
Recordable	541	1/28/2015	6:45am	1/28/2015	7:00am	15min	0.016	2.91	270.96	0.26	4.27	1.09	Low interstage pressure, amine reboiler transmitter malfunctioned	Clear transmitter, reset and restart AGI compressor.
Recordable	544	2/6/2015	3:40am	2/6/2015	3:45am	5min	0.007	1.27	118.54	0.11	1.87	0.48	High 2nd stage discharge temperature	Restarted unit and checked for hot valves, none were found. AGI continued running
Recordable	548	2/11/2015	9:00am	2/11/2015	10:00am	1hr	0.026	4.73	440.31	0.42	6.93	1.77	High 1st stage scrubber level due to plugged drain valve	Clean valve and place AGI compressor back in service
Recordable	549	2/14/2015	12:50pm	2/14/2015	1:10pm	20min	0.005	0.91	84.67	0.08	1.33	0.34	1st stage suction pressure, trends did not show a valid reason	Checked all settings and possible causes. Reset and restarted AGI compressor.
Recordable	553	2/18/2015	10:00am	2/18/2015	10:20am	30min	0.01	1.82	169.35	0.31	2.67	0.68	Mechanics were working on scrubber pump, high scrubber liquid level	Drain scrubber after pump was repaired and placed AGI compressor back in service
Recordable	554	2/18/2015	12:55pm	2/18/2015	1:25pm	30min	0.01	1.82	169.35	0.31	2.67	0.68	1st stage high discharge temperature	No action taken, placed AGI compressor back in service, possible sign of hot valves
Recordable	556	2/20/2015	10:15am	2/20/2015	10:25am	10min	0.005	0.91	84.67	0.16	1.33	0.34	1st stage high pressure shutdown	Possible liquids in valve, reset and restart AGI compressor
Recordable	558	2/22/2015	10:40pm	2/22/2015	10:45pm	5min	0.005	0.91	84.67	0.16	1.33	0.34	4th stage high suction temperature	Checked cooling fans and placed AGI compressor back in service
Recordable	563	3/1/2015	8:40pm	3/1/2015	8:50pm	10min	0.004	0.73	67.74	0.12	1.07	0.27	Low 1st stage suction pressure	Adjusted set points, volumes and temperature. Reset and restart AGI compressor
Recordable	564	3/1/2015	11:15pm	3/1/2015	11:35pm	20min	0.008	1.45	135.48	0.25	2.13	0.54	Flagged low suction pressure	Trended pressures/temps. No readings out of parameters, monitor. Reset and restart AGI
Recordable	565	3/2/2015	2:30pm	3/2/2015	2:45pm	15min	0.0162	2.94	274.35	0.50	4.32	1.10	Low 1st stage suction pressure	Adjust set points, volumes and temperature. Reset and restart AGI compressor
Recordable	569	3/7/2015	1:00pm	3/7/2015	1:40pm	40min	0.028	5.09	474.18	0.87	7.48	1.90	Low 1st stage suction pressure de to amine system fluctuation	Stabilize amine system, line out plant operations, place AGI back in service.
Recordable	573	3/18/2015	4:45am	3/18/2015	5:00am	15min	0.0073	1.33	123.83	0.23	1.95	0.50	False shutdown on dehy skid stack temperature	Dehy skid was out of service at the time, Place AGI compressor back in service.
Recordable	574	3/18/2015	10:00am	3/18/2015	10:05am	5min	0.001	0.18	16.93	0.03	0.27	0.07	Shutdown while placing the dehy skid back in service.	Place dehy skid back in service and restart the AGI compressor
Recordable	575	3/18/2015	10:00pm	3/18/2015	10:20pm	20min	0.015	2.73	254.02	0.47	4.00	1.02	Low 5th stage suction pressure	Reset and restart AGI compressor. Monitor suction pressures
Recordable	577	4/2/2015	4:30pm	4/2/2015	5:00pm	30min	0.0169	3.07	286.20	0.52	4.51	1.15	Low 1st stage suction pressure due to amine system fluctuation	Change out sock filters and place AGI compressor back in service.
Recordable	578	4/2/2015	10:30pm	4/2/2015	10:45pm	15min	0.023	4.18	389.50	0.71	6.13	1.56	Low 1st stage suction pressure	Stabilize amine system, place AGI back in service.
Recordable	579	4/3/2015	6:25am	4/3/2015	6:45am	20min	0.0133	2.42	225.23	0.41	3.55	0.90	Low 1st stage suction pressure	Reset and restarted AGI compressor
Recordable	581	4/6/2015	4:00am	4/6/2015	4:30am	30min	0.014	2.54	237.09	0.43	3.73	0.95	Agi dehydrator reboiler hi temp shutdown	Make process adjustments to lowe temperature
Recordable	583	4/19/2015	12:00pm	4/19/2015	12:10pm	10min	0.002	0.36	33.87	0.06	0.53	0.14	Low 1st stage suction pressure due to foaming in amine system	Added anti foaming material
Recordable	584	4/20/2015	11:20am	4/20/2015	11:35am	15min	0.003	0.55	50.80	0.09	0.80	0.20	Low 1st stage suction pressure due to foaming in amine system	Added anti foaming material
Recordable	586	4/21/2015	10:00am	4/21/2015	10:10am	10min	0.005	0.91	84.67	0.16	1.33	0.34	Low 1st stage suction pressure, skimming of the flash tank	Completed skimming of the flash tank
Recordable	589	4/28/2015	6:50pm	4/28/2015	7:00pm	10min	0.002	0.36	33.87	0.06	0.53	0.14	4th stage high temperature due to tripped breaker on cooling fans	Reset tripped breaker on cooling fans
Recordable	592	5/7/2015	7:00am	5/7/2015	8:00am	1hr	0.02	3.64	338.70	0.62	5.33	1.36	High coalescer scrubber level	Drain scrubber, reset and restart AGI compressor
Recordable	595	5/8/2015	4:20pm	5/8/2015	4:45pm	25 min	0.018	3.27	304.83	0.56	4.80	1.22	#4 recompressor went down causing plant upset	Restart recompressor, line out plant, reset and restart AGI compressor
Recordable	596	5/8/2015	6:35pm	5/8/2015	6:50pm	15min	0.007	1.27	118.54	0.22	1.87	0.48	Low 5th stage suction pressure due to draining coalescer	Filter drained and unit put back online
Recordable	597	5/9/2015	4:25am	5/9/2015	4:35am	10min	0.005	0.91	84.67	0.16	1.33	0.34	Low 1st stage suction pressure due to amine still overhead temperature	Raise overhead temperature on amine still
Recordable	598	5/11/2015	2:00am	5/11/2015	2:20am	20min	0.011	2.00	186.28	0.34	2.93	0.75	Operator shutdown due to leak on dehydrator skid	Bypassed dehydrator skid, restart unit
Recordable	600	5/11/2015	10:00pm	5/11/2015	10:20pm	20min	0.0193	3.51	326.84	0.60	5.15	1.31	High coalescer level	Drain coalescer and restart unit
Recordable	601	5/12/2015	3:40am	5/12/2015	4:10am	30min	0.0172	3.13	291.28	0.53	4.59	1.17	Low 1st stage suction, amine system fluctuation	Change sock filters, make process adjustments to amine system
Recordable	602	5/12/2015	11:30am	5/12/2015	12:00pm	30min	0.016	2.91	270.96	0.50	4.27	1.09	High coalescer level	Drain coalescer and restart unit
Recordable	607	5/16/2015	3:15pm	5/16/2015	4:00pm	45min	0.016	2.91	270.96	0.50	4.27	1.09	High 3rd stage scrubber level	I&E worked on scrubber dumps, restart unit
Recordable	612	5/26/2015	5:00pm	5/26/2015	5:15pm	15min	0.01	1.82	169.35	0.31	2.67	0.68	High 1st stage scrubber level	Drain scrubbers, restart unit
Recordable	613	5/27/2015	3:15pm	5/27/2015	4:00pm	45 min	0.021	3.82	355.83	0.65	5.60	1.43	Low 1st stage suction pressure	Reset glycol pump, restart unit
Recordable	616	5/31/2015	10pm	5/31/2015	10:30pm	30min	0.024	4.36	406.44	0.75	6.40	1.63	2nd stage discharge pressure high	Reset and restart AGI compressor
Recordable	624	6/14/2015	9pm	6/14/2015	9:10pm	10min	0.0076	1.38	128.71	0.24	2.03	0.52	Power interruption	Restart equipment
Recordable	629.1	6/29/2015	12:25pm	6/29/2015	12:30pm	5min	0.004	0.73	67.74	0.12	1.07	0.27	Switching TEG pumps, no alarms indicated	Reset and restart AGI compressors
														Restart plant, line out plant process, r

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Regency Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	01/01/2014	**Report Period End Date**	6/30/2014	**Operating Permit Number**	**O-2546**	**Report Submittal Date**	07/29/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
FLARE 70		2.F	SO2, H2S, NOx, VOC	101.201	Report	60A-001		

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	See Attch.	1/1/15	12:00a	6/30/15	12:00a	68	See Attachment	See Attachment
				Total Deviations:		**68**	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

WAHA AGI Stream H_2S,SO_2, NO_X, CO and VOC Calculation Sheet

STEERS Incident Number	event #	Date Down	Down Time	Date on	On Time	Total Time (hrs)	Gas Volume (mmscf)	Emissions (lb)					Cause of Flare Event	Corrective Action Taken
								H_2S	SO_2	NO_X	CO	VOC		
207981	520	1/1/2015	5:00 PM	1/9/2015	9:50am	182hr 50m	2.6812	487.31	45406.01	42.90	714.81	182.09	Multiple Events, SD of recompressor, ESD, low inlet volum power failure, 3rd party	Repair mechanical issues, establish adequate inlet volume, restore power, restart plan and AGI
208332	521	1/10/2015	2:00 PM	1/10/2015	11:00pm	9hr	0.1527	27.75	2585.97	2.44	40.71	10.37	Shutdown of 3 and 4 recompressores caused the plant to go down, plant went sour	Called out mechanics and contractors to restart the recompressors and plant, recycle gas to sweeten up.
208338	522	1/11/2015	5:30am	1/11/2015	5:00pm	11hr 30m	0.1525	27.72	2582.58	2.44	40.66	10.36	Low inlet gas volumes due to field compression operability	Reset and restart AGI compressor when adequate inlet volumes were established by the field units
208526	524	1/13/2015	3:00pm	1/13/2015	8:00pm	5hr	0.1807	32.84	3060.15	2.89	48.18	12.27	Amine system fluctuations caused the AGI compressor to go down	Tune/adjust valve 7751 on the amine flash tank, stabilize amine system, reset and restart AGI compressor.
208529	525	1/14/15	4:00am	1/14/2015	5:00pm	13hr	0.363	65.98	6147.39	5.81	96.78	24.65	Low inlet gas volumes due to field compression operability	Reset and restart AGI compressor when adequate inlet volumes were established by the field units
208649	526	1/14/2015	7:00pm	1/15/2015	6:00pm	23hr	0.89063	161.87	15082.78	14.25	237.44	60.48	High 2nd stage discharge pressure due to hot valves (poppet valves)	Issue work order for mechanics to replace valves, replace valves, reset and restart AGI compressor
208736	527	1/15/2015	5:00pm	1/16/2015	10:00am	15hr	0.116	21.08	1964.45	1.86	30.93	7.88	High coalescer filter level and 4th stage scrubber level, multiple events	Reduce high liquied levels, reset restart AGI compressor. Work order written for I&E to check dump system
208832	529	1/17/2015	12:00pm	1/17/2015	6:00pm	6hr	0.106	19.27	1795.11	1.70	28.26	7.20	Low suction pressure due to reflux drum level. Low amine still temperature.	Establish adequate amine still temps and reflux drum pressures. Reset and restart AGI compressor.
208833	530	1/18/2015	12:00pm	1/18/2015	2:30pm	2hr 30m	0.1112	20.21	1883.17	1.78	29.65	7.55	Unstable levels in the amine system	Stabilize amine system, line out plant operations, place AGI back in service.
208837	531	1/18/2015	8:30am	1/18/2015	1:30pm	5hr	0.108	19.63	1828.98	1.73	28.79	7.33	Low suction pressure due low amine still temperature, upset in amine plant	Establish adequate amine still temps and reflux drum pressures. Reset and restart AGI compressor.
208971	533	1/20/2015	4:00pm	1/20/2015	6:00pm	2hrs	0.0904	16.43	1530.92	1.45	24.10	6.14	Low 2nd stage suction pressure, no cause identified	Checked for hot valves and other issues. None found. AGI placed back in service
209059	534	1/21/2015	7:00pm	1/22/2015	4:00am	9hr	0.3183	57.85	5390.40	5.09	84.86	21.62	High 1st stage suction due to upset in amine plant. Reboiler temps.	Establish adequate amine still temps and reflux drum pressures. Reset and restart AGI compressor.
209184	535	1/24/2015	2:05pm	1/24/2015	4:05pm	2hr	0.0602	10.94	1019.48	0.96	16.05	4.09	Data transmitter malfunction resulted in the shutdown of the amine system pumps	Check and cleat transmitter, restart pumps and compressors.
209185	536	1/24/2015	6:00pm	1/25/2015	12:30am	6hr 30min	0.2758	50.13	4670.66	4.41	73.53	18.73	Amine system fluctuations caused the AGI compressor to go down	Operations checked the system and found nothing wrong, place AGI back in service
209211	537	1/25/2015	6:00pm	1/26/2015	12:30am	6hr 30min	0.2758	50.13	4670.66	4.41	73.53	18.73	Low 1st stage pressure, malfunction on the amine booster pump	Switch amine booster pumps, place AGI compressor back in service.
209453	538	1/25/2015	10:00am	1/25/2015	1:00pm	3hr	0.0588	10.69	995.78	0.94	15.68	3.99	Lubricator no flow (lube oil flow) faulty lubricator block	Replace lubricator block, reset and restart AGI compressor
209457	539	1/26/2015	12:00am	1/26/2015	4:00am	4hr	0.1563	28.41	2646.93	2.50	41.67	10.61	Amine pump low discharge pressure causing the amine system to fluctuate	Repair and switch amine pumps, place AGI compressor back in service
209452	542	1/28/2015	10:30am	1/28/2015	1:05pm	3hr 5min	0.1188	21.59	2011.87	1.90	31.67	8.07	High 1st stage temperature due to burned out motor on the fan	Change out reflux fan motor, reset and restart AGI compressor
209471	543	2/5/2015	1:00am	2/5/2015	3:00am	2hr	0.13	23.63	2201.54	2.08	34.66	8.83	High 1st stage suction pressure due to amine temperatures	Process adjustments to amine system, lower inlet rate, reset and restart AGI compressor
209868	545	2/8/2015	6:40am	2/8/2015	7:40am	1hr	0.055	10.00	931.42	0.88	14.66	3.74	High 2nd stage discharge temperature due to faulty transmitter	Replaced trnsmitter and placed AGI back in service
209882	546	2/7/2015	5:20pm	2/7/2015	6:50pm	1hr 30min	0.0352	6.40	596.11	0.56	9.38	2.39	High amine system pressure fluctuation	Troubleshoot amine system, stabilize pressure, place AGI compressor back in service
209882	547	2/9/2015	12:30pm	2/9/2015	1:30pm	1hr 30min	0.0846	15.38	1432.70	1.35	22.55	5.75	High amine system pressure fluctuation	Troubleshoot amine system, stabilize pressure, place AGI compressor back in service
209918	550	2/15/2015	2:30pm	2/16/2015	7:30pm	29hr 30min	1.2049	218.99	20404.93	19.28	321.23	81.83	Low/no flow oil lubricator, braided hose broke on PSV, PSV had to be inspected	Resolve oil issue, located and replace broken hose, 3rd party inspection of PSV, restart AGI compressor
210175	551	2/16/2015	9:00pm	2/16/2015	10:00pm	1hr	0.0481	8.74	814.57	0.77	12.82	3.27	Low suction pressure due to low amine still temperature	Operations made process adjustments to bring amine still temperature to within operating parameters
210358	552	2/17/2015	3:30am	2/17/2015	5:30am	2hr	0.0954	17.34	1615.59	1.53	25.43	6.48	High dehydrator coalescer level due to glycol pump losing prime	Reprime pump and place back in service, reset and restart AGI compressor
210359	555	2/19/2015	12:15pm	2/19/2015	6:15pm	6hr	0.3185	57.89	5393.78	9.89	84.91	21.63	3rd stage suction hot valves (poppet valves)	Called out mechanics, replace valves, place AGI compressor back in service
210433	557	2/20/2015	1:20pm	2/20/2015	2:35pm	1hr 15m	0.0468	8.51	792.56	1.45	12.48	3.18	Low/no flow oil lubricator, mechanics checked lubricator system and found no issues	Checked lube oil system, reset and restarted AGI compressor
210479	559	2/23/2015	2:00pm	2/23/2015	7:30pm	5hr 30min	0.154	27.99	2607.98	4.78	41.06	10.46	Plant shutdown on expander operation programming error	Resolved programming issue. Restart plant and AGI compressor
210582	560	2/26/2015	3:30am	2/26/2015	6:00am	2hr 30min	0.132	23.99	2235.41	4.10	35.19	8.96	High 2nd stage discharge pressure due to faulty transmitter	Replace transmitter, reset and restart AGI compressor
210963	561	2/26/2015	8:00pm	2/27/2015	12:00pm	18hr	0.6605	120.05	11185.54	20.51	176.09	44.86	Low/no flow compressor lubricator	Purge oil lines, manually operate oil pump, PM lube oil system and replace tubing. Restart AGI compressor
210710	562	3/1/2015	9:35am	3/1/2015	6:35pm	9hr	0.2272	41.29	3847.62	7.05	60.57	15.43	Low 1st stage suction pressure, amine system fluctuations due to low inlet volumes	Stabilize amine system, line out plant operations, place AGI back in service.
210777	566	3/3/2015	4:20am	3/3/2015	5:00am	40min	0.0298	5.42	504.66	0.93	7.94	2.02	Low 1st stage suction pressure, unit ran all night at 5lbs and was at 5lbs when it shutdown	Reset and restart AGI compressor and monitor operation
210822	567	3/3/2015	7:00pm	3/3/2015	8:40pm	1hr 40m	0.07	12.72	1185.45	2.17	18.66	4.75	Low/no flow lubricator right bank	Purge oil lines downstream of filter housing, manually prime oil pump, Restart AGI compressor
210899	568	3/6/2015	2:00pm	3/6/2015	4:00pm	2hr	0.105	19.08	1778.17	3.26	27.99	7.13	High 2nd stage discharge pressure due to amine system fluctuation	Stabilize amine system, line out plant operations, place AGI back in service.
211020	570	3/10/2015	12:45pm	3/10/2015	2:15pm	1hr 30min	0.078	14.18	1320.93	2.42	20.79	5.30	Low 1st stage suction pressure due to low inlet volume, inlet gas unit being worked on	Reset and restart AGI compressor when adequate inlet volumes were established. Complete work on unit
211162	571	3/11/2015	10:45am	3/11/2015	7:00pm	8hr 15min	0.1948	35.41	3298.93	6.05	51.93	13.23	Process issues with the gas treating system causing the plant to go sour, residue sales closed	Recycle gas through treating system, open sales line when gas was sweet, reset and restart AGI comp.
211240	572	3/17/2015	7:15pm	3/18/2015	12:15am	5hr	0.2881	48.73	4540.26	8.32	71.48	18.21	High 2nd and 3rd discharge pressure due to hot valves. High 4th stage scrubber level	Change out hot valves, drain scrubber reset and restart Agi compressor.
211477	576	3/21/2015	11:00am	3/21/2015	8:00pm	9hr	0.0889	16.16	1505.52	2.76	23.70	6.04	South hot oil pump had an electrical short, tripping main panel and shutting the plant down	Isolated pump from panel, restore power, restart plant and AGI compressor.
211624	580	4/5/2015	2:30pm	4/5/2015	3:19pm	40 min	0.0308	5.60	521.80	0.96	8.21	2.09	High 4th stage suction pressure due to high temperatures	Open louvers, ensure fans are operating properly
212222	582	4/18/2015	7:00pm	4/18/2015	7:45pm	45min	0.0316	5.74	535.14	0.98	8.42	2.15	Amine system flucutation, low plant inlet volume	Stabilize amine system once plant inlet volumes were established
212845	585	4/20/2015	5:00pm	4/20/2015	6:20pm	1hr 20min	0.0524	9.52	887.39	1.63	13.97	3.56	High 2nd stage discharge pressure, foaming on amine flash tank	Lowered suction temperature, stopped dumping on flash tank
212900	587	4/21/2015	10:30pm	4/21/2015	11:30pm	1hr	0.0466	8.47	789.17	1.45	12.42	3.16	Low 1st stage suction pressure, inlet flow to AGI, plant upset	Stabilize plant process, reset and restart AGI compressor
213022	588	4/23/2015	11:50am	4/21/2015	7:35pm	7hr 45m	0.1077	19.57	1823.89	3.34	28.71	7.31	Low 1st stage suction pressure due to amine system, treater saturated with hydrocarbons, plant sour	Skimmed amine flash tank, added anti-foaming material, restart AGI compressor after plant was lined out
213084		5/1/2015	---	---	---	---	0	0.00	0.00	0.00	0.00	0.00	No emission event occurred, no volume	
213424	590	5/8/2015	2:55pm	5/8/2015	3:55pm	1hr	0.0517	9.40	875.54	1.61	13.78	3.51	High 2nd stage discharge pressure due to high temperature/pressure on AGI dehy reboiler	Lowered temperature/pressure on dehy reboiler
213693	591	5/6/2015	7:50pm	5/8/2015	9:50pm	2hr	0.1366	24.83	2313.32	4.24	36.42	9.28	High glycol coalescer level due to plugged valve	Clean valve, reset restart AGI compressor
213695	593	5/7/2015	3:00pm	5/7/2015	8:35pm	5hr 35min	0.2706	49.18	4582.80	8.40	72.14	18.38	High 2nd stage discharge temperature, hot valves	Call out mechanic, replace hot valves
213741	594	5/8/2015	2:35am	5/8/2015	2:55am	20min	0.01	1.82	169.35	0.31	2.67	0.68	High coalescer scrubber level	Drain scrubber, reset and restart AGI compressor
213747	599	5/11/2015	11:30am	5/11/2015	4:00pm	3hr 30min	0.1416	25.74	2397.99	4.40	37.75	9.62	Carbon filter case being placed in service, affected amine system, dehydrator maintenance	Completed placing carbon filter in service, complete maintenance, restart unit
213911	603	5/12/2015	7:00pm	5/13/2015	2:00pm	20hr	0.262	47.62	4436.06	8.13	69.85	17.79	Plant shutdown, amine levels in system vessels, plant went sour, low inlet volumes, liquids H2S	Restart plant, increase volumes, resolve H2S issues, restart AGI compressor
214036	604	5/13/2015	6:15pm	5/13/2015	12:15am	6hr	0.0712	12.94	1205.77	2.21	18.98	4.84	Low 1st stage suction, reduced inlet gas, High absorber level, plant sour, sales line shut in	Recycle gas, correct absorber levels, open sales line when gas was sweet, reset and restart AGI comp.
214137	605	5/15/2015	10:40am	5/15/2015	12:00pm	1hr 20min	0.0493	8.96	834.89	1.53	13.14	3.35	Low flow glycol on the dehdrator skid	Switched gylcol pumps, aadded fluid to the system, restart unit
214201	606	5/16/2015	12:30am	5/16/2015	3:30am	3hrs	0.0753	13.69	1275.20	2.34	20.08	5.11	Low 1st stage suction due to inlet turbin shutting down on weather related electrical issues	Inlet turbine restarted, AGI unit restarted
214261	608	5/18/2015	5:00am	5/18/2015	3:15pm	10hr 15min	0.1303	23.68	2206.62	4.05	34.74	8.85	4 recompressor shutdown due to a bad relay, not enough heat for HO system, plant went sour	Replace relay, restart recompressor, reach proper HO temps, recycle gas, line out process, restart unit
214387	609	5/19/2015	7:20pm	5/21/2015	7:00pm	72hr 25min	0.2329	42.33	3944.15	7.23	62.09	15.82	Weather related, plant shutdown, power loss in area, customers could not receive product	Restart lant once power was restored and customers were able to receive product
214436	610	5/22/2015	12:45pm	5/22/2015	6:30pm	5hr 45min	0.1389	25.25	2352.27	4.31	37.03	9.43	High 3rd stage scrubber level	Drain scrubber, I&E worked on scrubber dumps, reset and restart AGI compressor
214614	611	5/23/2015	2:30pm	5/24/2015	1:30am	11hr	0.1494	27.15	2530.08	4.64	39.83	10.15	Power outage, 3rd party provider	Restart plant once power was restored, increase volumes, restart unit
214620	614	5/28/2015	8:15pm	5/29/2015	7:00am	10hr 45min	0.209	37.99	3539.41	6.49	55.72	14.19	2nd stage discharge pressure then a power blip and later a complete power outage	Restart AGI, Call out I&E to reset breaker, restart unit after power was restored and plant lined out
214836	615	5/29/2015	2am	5/30/2015	3:30am	25 hr30min	0.2393	43.49	4052.54	7.43	63.80	16.25	Multiple Events, SD of recompressor, ESD, low inlet volum power failure, 3rd party	Restart plant once power was restored, increase volumes, restart unit
214905	617	6/1/2015	11:30am	6/1/2015	3pm	3hr 30min	0.2044	37.15	3461.51	6.35	54.49	13.88	High 2nd stage discharge pressure, hot valves, poppet valves	Replace poppet valves, reset and restart compressor
215066	618	6/4/2015	7am	6/4/2015	5:30pm	10hr 30min	0.0633	11.50	1071.98	1.97	16.88	4.30	Maintenance, replace breaker, recompressors, valve malfunction	Replace breaker, repair recompressor, customer repair valve, restart plant and AGI
215305	619	6/4/2015	5:30pm	6/5/2015	6am	12hr 30min	0.3489	63.41	5908.81	10.83	93.02	23.69	Low pressure lube oil	Change oil, filters and clear lube oil pressure transmitter, restart AGI
215331	620	6/5/2015	10am	6/6/2015	5pm	10hr	0.1919	34.88	3249.82	5.96	51.16	13.03	Low lube oil pressure	Change set points on pressure trnasmitter, replace oil pump and regulator
215365	621	6/6/2015	9:50pm	6/8/2015	11:30pm	1hr 40min	0.0437	7.94	740.06	1.36	11.65	2.97	Low 5th stage suction pressure while draining coalescer	Restart AGI compressor after draining coalescer
215377	622	6/12/2015	3pm	6/12/205	8:30pm	4hr 30 min	0.1321	24.01	2237.11	4.10	35.22	8.97	Low flow right bank lube oil	Reset rod load shutdown, restart compressor
215688	623	6/14/2015	11:30am	6/14/2015	4pm	4hr 30 min	0.0331	6.02	560.55	1.03	8.82	2.25	Control workers took power off recompressors, battery power did support operations, plant shutdown	Power up recompressors, restart plant and AGI compressor
215764	625	6/15/2015					0	0.00	0.00	0.00	0.00	0.00	No emission event occurred	
215741	626	6/19/2015	8:45pm	6/19/2015	11:15pm	2hr 30 min	0.0331	6.02	560.55	1.03	8.82	2.25	Low suction pressure, transmitter blowdown on amine system, fluctuation, rod load on restart	Stabilize amine pressures, reboot AGI panel, restart compressor
216094	627	6/20/2015	4pm	6/20/2015	8:30pm	4hr 30min	0.1714	31.15	2902.65	5.32	45.70	11.64	High 5th stage rod load	Replace poppet valves, reset and restart compressor, check rod load
216107	628	6/25/2015	3:30pm	6/25/2015	5:30pm	2hr	0.0615	11.18	1041.50	1.91	16.40	4.18	Rod tension calculations, malfunctioning check valve at startup	Rerun calculations, adjust set points.
216378	629	6/22/2015					0	0.00	0.00	0.00	0.00	0.00	No emission event occurred	
216203														Restart plant, line out plant process, r

Texas Commission on Environmental Quality
Federal Operating Permit Form
PCC - Previous Deviation Reports (Part 2)

Permit Holder Name	Regency Field Services LLC	**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant	**Account Number**	**PE-0024-Q**
Operating Permit Number	**O-2546**	**Report Submittal Date**	**7/30/2015**
Certification Period Start Date	**01/01/2015**	**End Date**	**6/30/2015**

Identification of Deviation Reports Submitted During the Certification Period

(Note: All reports must be certified to truth, accuracy, and completeness by the Responsible Official)

Report Date	Report Description (Name of unit, Name of Rule, Driver for report, etc)	Report Submitted To	Report Previously Certified? (Y/N)
1/1/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 207981	Region 7	N
1/10/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 208332	Region 7	N
1/11/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 208338	Region 7	N
1/13/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 208526	Region 7	N
1/14/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 208529	Region 7	N
1/14/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 208649	Region 7	N
1/15/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 208736	Region 7	N
1/17/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 208832	Region 7	N
1/18/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 208833	Region 7	N
1/18/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 208837	Region 7	N
1/20/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 208971	Region 7	N
1/21/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 209059	Region 7	N
1/24/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 209184	Region 7	N
1/24/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 209185	Region 7	N
1/25/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 209211	Region 7	N
1/25/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 209453	Region 7	N
1/26/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 209457	Region 7	N
1/28/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 209452	Region 7	N

2/5//2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 209471	Region 7	N
2/6/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 209868	Region 7	N
2/7//2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 209882	Region 7	N
2/9/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 209918	Region 7	N
2/15/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 210175	Region 7	N
2/16/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 210358	Region 7	N
2/17/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 210359	Region 7	N
2/19/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 210433	Region 7	N
2/20/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 210479	Region 7	N
2/23/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 210582	Region 7	N
2/26/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 210963	Region 7	N
2/26/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 210710	Region 7	N
3/1/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 210777	Region 7	N
3/3/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 210822	Region 7	N
3/3/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 210899	Region 7	N
3/6/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 211020	Region 7	N
3/10/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 211162	Region 7	N
3/11/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 211240	Region 7	N
3/17/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 211477	Region 7	N
3/21/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 211624	Region 7	N
4/5/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 212222	Region 7	N
4/18//2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 212845	Region 7	N
4/20/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 212900	Region 7	N
4/21/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 213022	Region 7	N
5/1/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 213084	Region 7	N
5/6/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 213693	Region 7	N
5/6/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 213695	Region 7	N
5/7/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 213741	Region 7	N
5/8/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 213747	Region 7	N
5/11/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 213911	Region 7	N

5/12/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 214036	Region 7	N
5/13/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 214137	Region 7	N
5/15/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 214021	Region 7	N
5/16/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 214621	Region 7	N
5/18/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 214387	Region 7	N
5/19/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 214436	Region 7	N
5/22/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 214614	Region 7	N
5/23/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 214620	Region 7	N
5/28/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 214836	Region 7	N
5/29/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 214905	Region 7	N
6/1/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 215066	Region 7	N
6/4/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 215305	Region 7	N
6/4/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 215331	Region 7	N
6/5/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 215365	Region 7	N
6/6/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 215377	Region 7	N
6/12/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 215688	Region 7	N
6/14/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 215764	Region 7	N
6/15/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 215741	Region 7	N
6/19/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 216094	Region 7	N
6/20/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 216107	Region 7	N
6/25/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 216378	Region 7	N
6/22/2015	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) STEERS Incident 216203	Region 7	N

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ENERGY TRANSFER

Energy Transfer Field Services, LLC
3001 W. 9th St
Fort Stockton, TX 79735

A1/A1/CO

January 29, 2016

Texas Commission on Environmental Quality
Region 7 Midland
9900 W. I-20
Ste.100
Midland, TX, 79706

Re: Permit Compliance Certification and Semiannual Deviation Report
Energy Transfer Field Services
Waha Gas Plant
RN100211408
CN603263823

Attached, please find the July 1-December 31, 2015 Permit Compliance Certification and Deviation Report for the above referenced facility.

Should you require any additional information concerning this submittal, please contact me.

ENERGY TRANSFER

Scott Heysquierdo – Environmental Specialist
3001 W. 9th St. Fort Stockton, TX 79735 | 432-210-9064
Scott.Heysquierdo@EnergyTransfer.com

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION

A. RN: 100211408	B. CN: 603263823	C. Account No.: PE-0024-Q
D. Permit No.: O-2546	E. Project No.:	
F. Area Name: Waha Gas Plant		
G. Company Name: Energy Transfer Field Services		

II. CERTIFICATION TYPE *(Please mark the appropriate box)*

A. ☒ Responsible Official:	B. ☐ Duly Authorized Representative:

III. SUBMITTAL TYPE *(Place an "X" in the appropriate box) (Only one response can be accepted per form)*

☐ SOP/TOP Initial Permit Application	☐ Update to Permit Application
☐ GOP Initial Permit Application	☐ Permit Revision, Renewal, or Reopening
☒ Other: Semiannual Deviation Report, Permit Compliance Certification	

IV. CERTIFICATION OF TRUTH

This certification does not extend to information which is designated by the TCEQ as information for reference only.

I, Greg McIlwain, certify that I am the RO for this application
(Certifier Name printed or typed) *(RO or DAR)*

and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period in Section IV.A below, or on the specific date(s) in Section IV.B below, are true, accurate, and complete:

Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).

A. Time Period: From 01/01/2015 to 12/31/2015
*Start Date** *End Date**

OR

B. Specific Dates: _____ _____ _____ _____ _____ _____ _____ _____
*Date 1** *Date 2** *Date 3** *Date 4** *Date 5** *Date 6** *Date 7** *Date 8**

**The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'*

Signature: [signature] Signature Date: 1/27/16

Title: VP OPERATIONS

Texas Commission on Environmental Quality
Federal Operating Permit Form
Permit Compliance Certification – PCC (Part 1)

Permit Holder Name	Energy Transfer Field Services LLC	**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant	**Account Number**	**PE-0024-Q**
Operating Permit Number	**O - 2546**	**Report Submittal Date**	**1/29/2016**
Certification Period Start Date	**7/1/2015**	**End Date**	**12/31/2015**

I. Certification of Continuous Compliance with Permit Terms and Conditions **(Indicate response by placing a 'x' in the appropriate column for each of the following questions)**	**Response:** Yes	No
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?	☒	☐

II. Summary of Deviations **(Indicate response by placing a 'x' in the appropriate column for each of the following questions)**	**Response:** Yes	No
A. Were there any deviations from any permit requirements during the Certification Period that have *previously* been reported to the agency? If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal. *Important Note:* If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.	☒	☐
B. Were there any deviations from any terms or conditions of the permit during the Certification Period that are *currently* being submitted to the agency? If the answer to this question is 'Yes', please include the relevant reports along with this page.	☒	☐

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Energy Transfer Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	7/01/2015	**Report Period End Date**	12/31/2015	**Operating Permit Number**	**O-2546**	**Report Submittal Date**	1/29/2016

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	**Group ID**							
FLARE 70		2.F	SO2, H2S, NOx, VOC	101.201	Report	60A-001		

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	See Attch.	7/1/15	12:00a	12/31/15	12:00a	48	See Attachment	See Attachment
				Total Deviations:		48	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

WAHA AGI Stream H_2S,SO_2, NO_X, CO and VOC Calculation Sheet

STEERS Incident Number	event #	Date Down	Down Time	Date on	On Time	Total Time (hrs)	Gas Volume (mmscf)	Emissions (lb)					Cause of Flare Event	Corrective Action Taken
								H_2S	SO_2	NO_X	CO	VOC		
216569	630	7/1/2015	8:00am	7/1/2015	10:00pm	14hr	0.1415	25.72	2306.30	4.39	37.72	9.61	Plant shutdown for maintenance	Restart plant, line out plant process, r
216801	631	7/5/2015	10:00am	7/8/2015	4:00pm	78hr	1.9443	353.38	32926.64	60.36	518.35	132.04	Power outage, 3rd party provider, damage to AGI panel as a result of outage/restoration	Restart plant once power was restored, increase volumes, repair AGI panel, restart unit.
217021	632	7/9/2015	4:45pm	7/9/2015	11:45pm	7hr	0.1066	19.37	1805.27	3.31	28.42	7.24	Power outage, 3rd party provider, weather related	Restart plant once power was restored reset and restart AGI unit.
217098	633	7/11/2015	3:05pm	7/9/2015	4:25pm	1hr 20 min	0.0494	8.98	836.59	1.53	13.17	3.35	Low/no flow on oil lubrication system	Replace traybon block on lubricator system
217120	635	7/12/2015	3:00pm	7/12/2015	9:25pm	3hr 15min	0.1061	19.28	1796.80	3.29	28.29	7.21	High coalescer level, transmitter showing false level	I&E reset transmitter in coalescer, restart unit
217212	636	7/13/2015	3:10pm	7/13/2015	10:25pm	7hr 15min	0.2026	36.82	3431.02	6.29	54.01	13.76	High discharge pressure, high coalescer level, misaligned valve indicating valve sequence failure	Drain coalescer, check xmtr, correct valve sequence, restart unit
217761	643	7/25/2015	3:20pm	7/25/2015	5:45pm	2hr 45min	0.089	16.18	1507.21	2.76	23.73	6.04	High 2nd stage discharge pressure, faulty transmitter	Replace transmitter, reset shutdown alarm, restart unit
218076	645	7/31/2015	1:45pm	7/31/2015	6:45pm	5hr	0.0899	12.70	1183.75	2.17	18.64	4.75	Power outage, 3rd party provider	Restart plant and AGI compressor once power was restored
218129	647	8/2/2015	9:45am	8/2/2015	1:45pm	4hr	0.1372	24.94	2323.48	4.26	36.58	9.32	Power outage, 3rd party provider	Restart plant and AGI compressor once power was restored
218383	648	8/5/2015	8:00pm	8/8/2015	10:30am	14hr	0.4884	88.77	8271.03	15.16	130.21	33.17	5th stage outlet valve malfuction, blown fuse, short in electrical junction box	Repair electrical short, replace fuse, restart unit
218450	649	8/7/2015	6:00pm	8/8/2015	12:00am	6hr	0.0824	14.98	1395.44	2.56	21.97	5.60	Power outage, 3rd party provider	Restart plant and AGI compressor once power was restored
218456	650	8/8/2015	6:30pm	8/8/2015	10:30pm	4hr	0.0749	13.61	1268.43	2.33	19.97	5.09	Power outage, 3rd party provider	Restart plant and AGI compressor once power was restored
218715	652	8/12/2015	3:50pm	8/12/2015	6:30pm	3hr 15min	0.0412	7.49	697.72	1.28	10.98	2.80	Hydrate blockage in warm exchanger, plant shutdown	Inject methanol into process stream to eliminate hydrates, restart plant and AGI compressor
218945	655	8/17/2015	3:30pm	8/17/2015	5:10pm	1hr 40 min	0.042	7.63	711.27	1.30	11.20	2.85	Power outage, 3rd party provider	Restart plant and AGI compressor once power was restored
219047	656	8/19/2015	7:25pm	8/19/2015	8:30pm	1hr 5min	0.0343	6.23	580.87	1.06	9.14	2.33	Inlet compressor shutdown on low suction reducing inlet volume to AGI compressor	Restart inlet compressor, establish adequate in let volume, restart AGI compressor
219194	657	8/23/2015	12:00pm	8/23/2015	6:30pm	6h 30min	0.1043	18.96	1766.32	3.24	27.81	7.08	Power outage, 3rd party provider	Restart plant and AGI compressor once power was restored
[illegible]3	659	8/31/2015	2:45pm	8/31/2015	4:30pm	1hr 45min	0.0417	7.58	706.19	1.29	11.12	2.83	Power outage, 3rd party provider	Restart plant and AGI compressor once power was restored
[illegible]	661	9/2/2015	8:45am	9/2/2015	2:50pm	6hr 5min	0.0395	7.18	668.03	1.23	10.53	2.68	Power outage, 3rd party provider, recompressor starting issues delayed startup	Repair and restart recompressors and plant, Restart AGI compressor
[illegible]2	662	9/2/2015	6:40pm	9/3/2015	6:10am	11hrs 30 min	0.032	5.82	541.92	0.99	8.53	2.17	Low suction pressure, liquid carryover from scrubber to contactor	Clear system of liquids, restart plant, establish adequate inlet volumes
219830	663	9/5/2015	2:00pm	9/5/2015	5:00pm	3hr	0.0364	6.62	616.43	1.13	9.70	2.47	Plant shutdown due to Expander shutdown on surge, AGI shutdown due to foaming in amine system	Pump methanol into cryo system, Inject antifoaming agent into amine system, restart plant and AGI
220082	667	9/11/2015	8:00pm	9/14/2015	3:00am	57hr	0.3792	68.92	6421.74	11.77	101.10	25.75	Low suction pressure due to foaming in amine system, gas went off spec, Recompressor down	Stabilize amine system, repair recompressor, reduce inlet gas, recirculate gas
220215	668	9/15/2015	11:30am	9/15/2015	10:40pm	10hr 40min	0.1443	26.23	2443.71	4.48	38.47	9.80	High 2nd and 3rd discharge pressure due to hot valves.	Replace valves as required, restart unit.
220327	671	9/18/2015	1:30am	9/18/2015	10:30am	9hr	0.1356	24.65	2296.38	4.21	36.15	9.21	Plant shutdown on process, AGI shutdown on amine system foaming	Restart plant, line out plant process and amine system, restart AGI compressor
220458	674	9/21/2015	6:45am	9/21/2015	9:15am	3hr 30min	0.076	13.81	1287.06	2.36	20.26	5.16	Low suction pressure due to foaming in amine system	Correct amine system pressure and flow, restart unit
220484	675	9/22/2015	5:00pm	10/0/2015	2:00pm	380hr	2.22	403.49	37595.60	68.92	591.86	150.76	Maintenance, low inlet volumes, 4 recompressor, power outage on startuf, injection well valve	Replace recompressor engine, replace well valve, start plant once power was restored, complete maint.
221565	678	10/13/2015	9:30am	10/13/2015	7:15pm	9hr 45min	0.2156	39.19	3651.18	6.69	57.48	14.64	No data on panel to indicate cause of unit shutdown, shutdown on low glycol circulation	Clear meter flow line, correct program logic on panel, rebuild glycol pump
221752	679	10/17/2015	6:30am	10/17/2015	4:00pm	9hr 30min	0.2541	46.18	4303.17	7.89	67.74	17.26	Low suction pressure, changing sock filters, lube oil pump malfunction	Complete filter change and repair lube oil pump
221980	681	10/21/2015	4:25am	10/21/2015	9:00am	4hrs 35min	0.1534	27.88	2597.82	4.76	40.90	10.42	False liquid level in dehydrator coalescer given by data transmitter	I&E troubleshoot transmitter, check level in coalescer, restart unit
222081	682	10/23/2015	1:00pm	10/24/2015	5:00pm	16hr	0.104	18.90	1761.24	3.23	27.73	7.06	#3 recompressor down for repairs, low inlet volumes, low suction to AGI, amine system	Restart recompressor, line out plant, reset and restart AGI compressor
222368	683	10/29/2015	10:45am	10/30/2015	6:15am	8hr	0.006	1.09	101.61	0.19	1.60	0.41	High suction temperature, high coalescer level	Adjust cooling fans, drain coalescer, restart unit, flared 8hrs during the event.
222485	687	11/2/2015	1:30am	11/2/2015	2:30am	1hr	0.0354	6.43	599.50	1.10	9.44	2.40	High inlet suction temperature	Adjust cooling fans, restart unit
222642	688	11/4/2015	1:45pm	11/4/2015	2:45pm	1hr	0.0424	7.71	718.04	1.32	11.30	2.88	Maintenance, AGI shutdown to update programming logic.	Update programming logic, restart unit.
222780	690	11/8/2015	2:45am	11/8/2015	12:30pm	9hr 45min	0.4612	83.82	7810.40	14.32	122.96	31.32	Shutdown on high rod load	Replace 8 valves on 4th stage and rebuild 4 on 5th stage
222799	691	11/9/2015	4:50pm	11/9/2015	10:00pm	5hr 10min	0.2242	40.75	3798.82	6.96	59.77	15.23	Shutdown on high rod load	Replace 4th and 5th stage valves
222876	692	11/10/2015	2:30pm	11/11/2015	6:50pm	28hr 20min	1.3387	243.31	22670.83	41.56	356.90	90.91	Rod load compression, damaged to 5th stage cylinder and rod	Pull piston and rod, send out for repair, replace rings and rod packing
223009	693	11/13/2015	10:30am	11/13/2015	5:00pm	7hr 30min	0.1172	21.30	1984.78	3.64	31.25	7.96	High 1st stage suction temperature, 3 recompressor shutdown, plant went sour (off-spec gas)	Restart 3 recompressor, recycle gas, line out plant, restart unit
223201	696	11/18/2015	10:00am	11/19/2015	10:00am	24hr		0.00	0.00	0.00	0.00	0.00	High diff. pressure on contactor, shut in gas, absorber pump malfunction, recompressor	Correct all process and mechanical issues, restart unit. Actuals on report, initial only submitted.
223302	697	11/21/2015	11:00pm	11/22/2015	11:00am	12hr	0.0532	9.67	900.94	1.65	14.18	3.61	High liquid scrubber levels, scrubber pump froze (weather)	Manually drain scrubbers as needed
223330	698	11/22/2015	7:15pm	11/22/2015	6:30pm	1hr 15min	0.0293	5.33	496.19	0.91	7.81	1.99	High liquid scrubber levels, scrubber pump froze (weather)	Manually drain scrubbers as needed, pump thawed out
223415	700	11/24/2015	9:30am	11/24/2015	12:30pm	3hr	0.0854	15.52	1446.25	2.65	22.77	5.80	High liquid scrubber levels, panel would not reset	Manually drain scrubbers, I&E techs reset panel
223459	701	11/25/2015	3:30am	11/25/2015	5:30pm	14hr	0.2404	43.69	4071.16	7.46	64.09	16.33	Plant shutdown, Amine system upset, Recompressor startup, scrubber dump system malfunction	Correct all process and mechanical issues, restart unit, see report
223470	702	11/26/2015	10:30pm	11/27/2015	12:45am	2hr 15min	0.0897	16.30	1519.07	2.78	23.91	6.09	Low suction pressure, amine contactor equipment	I&E repaired contactor equipment, unit was resrtarted before repair was made
223474	703	11/27/2015	5:45pm	11/28/2015	1:45am	8hrs	0.1907	34.66	3229.50	5.92	50.84	12.95	Low suction pressure, low inlet volumes, plant process issues	Line out plant, correct operating parameters, establish adequate suction pressure
223761	704	12/1/2015	5:20pm	12/1/2015	7:30pm	2hr 10min	0.0938	17.01	1585.11	2.91	24.95	6.36	1st stage suction scrubber level, False level reading, panel would not allow restart	Attempt restart, restart when panel would allow, I&E checked panel
223943	706	12/7/2015	6:45am	12/7/2015	9:30am	2hr 45min	0.1164	21.16	1971.23	3.61	31.03	7.90	No data flagged as to reason for shutdown	Restart unit when panel allowed
224284	709	12/12/2015	10:15am	12/12/2015	11:15am	55min	0.0394	7.16	667.24	1.22	10.50	2.68	High 4th liquid scrubber level	Manaully drain scrubber
224655	711	12/17/2015	3:00pm	12/18/2015	8:00pm	19hr	0.4177	75.92	7073.73	12.97	111.36	28.37	Lining out plant after cryo shutdown, pressure and volume swings, different shutdowns	Stabilize plant process, change set point on bypass valve to flare to send gas to AGI compressor
224809	713	12/21/2015	3:00pm	12/22/2015	4:30pm	25hr 30min	0.5182	94.18	8776.69	16.09	138.15	35.19	Plant emergency shutdown caused by loss of Delta V controls	Replaced fuses in Delta V, restart plant and AGI, 3rd party assistance

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Energy Transfer Field Services					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	7/01/2015	**Report Period End Date**	12/31/2015	**Operating Permit Number**	**O-2546**	**Report Submittal Date**	01/29/2016

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
FLARE 19		2.F	PM	111.111(a)(4)(A)	Monitor Report	514-04-004	Visible	Ongoing

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	220468	9/22/15	1500	9/29/15	1500	1	Plant shut down for maintenance	Restart plant and line out processes. Repair equipment as needed.
2	206655	11/20/15	0430	11/2015	1000	1	Hodge unit and flash gas units down. Hydrate blockage in line.	Eliminate hydrate blockage in line. Restart units.
3	224611	12/16/15	1400	12/17/15	1200	1	Hydrate blockage on separator line to flash tank.	Eliminate blockage in line. Resume normal operations.
				Total Deviations:		3	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?** ☐ YES ☐ NO	

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	Energy Transfer Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	07/01/2015	**Report Period End Date**	12/31/2015	**Operating Permit Number**	**O2546**	**Report Submittal Date**	01/29/2016

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
FLARE 70		2.F	SO2, H2S	101.201	Record	60A-001		

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	7/1/15	12:00a	12/31/15	12:00a	38	See Attached	See Attached
Total Deviations:					38	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

WAHA AGI Stream H_2S,SO_2, NO_X, CO and VOC Calculation Sheet

STEERS Incident Number	event #	Date Down	Down Time	Date on	On Time	Total Time (hrs)	Gas Volume (mmscf)	Emissions (lb)					Cause of Flare Event	Corrective Action Taken
								H_2S	SO_2	NO_X	CO	VOC		
Recordable	634	7/12/2015	8:25am	7/12/2015	8:30am	5min	0.002	0.36	33.87	0.06	0.53	0.14	High coalescer level	Reduce coalescer level, restart AGI compressor
Recordable	634.1	7/12/2015	11:25am	7/12/2015	11:50am	25min	0.0275	5.00	465.71	0.85	7.33	1.87	Right bank no flow lubricator system	Restart AGI compressor
Recordable	637	7/14/2015	9:00am	7/14/2015	9:15am	15min	0.004	0.73	67.74	0.12	1.07	0.27	High scrubber level	Check scrubber dumps, levels were within operating parameters
Recordable	638	7/14/2015	4:45pm	7/14/2015	5:00pm	15min	0.002	0.36	33.87	0.06	0.53	0.14	Low oil pressure	Check oil levels, all levels were within operating parameters
Recordable	639	7/19/2015	4:15pm	7/19/2015	4:40pm	25min	0.012	2.18	203.22	0.37	3.20	0.81	Low 2nd stage suction pressure, no cause identified	Reset and restart unit
Recordable	640	7/20/2015	7:00pm	7/20/2015	7:00pm	11pm	0.018	3.27	304.83	0.56	4.80	1.22	Power outage, 3rd party provider	Restart plant and AGI compressor once power was restored
Recordable	641	7/23/2015	5:35pm	7/23/2015	5:45pm	10min	0.0015	0.27	25.40	0.05	0.40	0.10	Low 2nd stage suction pressure, no cause identified	Reset and restart unit
Recordable	642	7/24/2015	2:55am	7/24/2015	3:00am	5min	0.0015	0.27	25.40	0.05	0.40	0.10	Low 2nd stage suction pressure, no cause identified	Check scrubber dumps, levels were within operating parameters, restart unit
Recordable	644	7/29/2015	9:30pm	7/29/2015	10:00pm	30min	0.02	3.64	338.70	0.62	5.33	1.36	Low 1st stage suction, swing in amine system pressure	Level out amine system pressure, restart unit
Recordable	646	8/1/2015	6:50am	8/1/2015	7:15am	25min	0.012	2.18	203.22	0.37	3.20	0.81	Low suction pressure, amine level fluctuation	Level out amine system pressure, restart unit
Recordable	651	8/11/2015	2:25pm	8/11/2015	2:35pm	10min	0.008	1.45	135.48	0.25	2.13	0.54	High inlet air temperature	Adjust cooling fans, restart unit
Recordable	653	8/13/2015	9:45pm	8/13/2015	9:55pm	10min	0.003	0.55	50.80	0.09	0.80	0.20	Amine level fluctuation	Stabilize amine level, restart unit
Recordable	654	8/14/2015	5:30pm	8/14/2015	7:30pm	2hr	0.021	3.82	355.63	0.65	5.60	1.43	Power outage due to weather	Restart plant and AGI compressor once power was restored
219284 R	658	8/24/2015	5:00am	8/24/2015	1:00pm	8hr	0.0219	3.98	370.88	0.68	5.84	1.49	Power outage, 3rd party provider, Replace faulty gasket	Restart plant and AGI compressor once power was restored, replace faulty gasket
219675 R	660	9/1/2015	7:00pm	9/1/2015	9:30pm	2hr 30min	0.0245	4.45	414.91	0.76	6.53	1.66	Plant shutdown, recompressors down due to liquid carry over from the separators	Clear system of liquids, restart plant, establish adequate inlet volumes
Recordable	664	9/8/2015	2:10pm	9/8/2015	2:20pm	10min	0.001	0.18	16.93	0.03	0.27	0.07	Low suction pressure due to foaming in amine system	Line out amine system, inject antifoaming agent, restart unit
R[illegible]ble	665	9/9/2015	10:20am	9/9/2015	10:45am	25min	0.017	3.09	287.89	0.53	4.53	1.15	Low suction pressure due to foaming in amine system	Line out amine system, inject antifoaming agent, restart unit
[illegible]ble	666	9/10/2015	7:20am	9/10/2015	7:25am	5min	0.001	0.18	16.93	0.03	0.27	0.07	Low suction pressure due to foaming in amine system	Line out amine system, inject antifoaming agent, restart unit
[illegible]ble	669	9/16/2015	9:55pm	9/15/2015	10:05pm	10min	0.002	0.36	33.87	0.06	0.53	0.14	Low 1st stage suction pressure, amine system fluctuations	Stabilize amine system
220017 R	670	9/17/2015	12:15pm	9/17/2015	5:15pm	5hr	0.0285	5.18	482.65	0.88	7.60	1.94	Low suction pressure due to foaming in amine system, restarting recompressor, plant operating	Restart recompressor, line out plant, reset and restart AGI compressor
Recordable	672	9/20/2015	2:35pm	9/20/2015	3:45pm	1hr 10min	0.015	2.73	254.02	0.47	4.00	1.02	Low suction pressure due to foaming in amine system	Line out amine system, inject antifoaming agent, restart unit
Recordable	673	9/20/2015	7:15pm	9/20/2015	7:25pm	10min	0.004	0.73	67.74	0.12	1.07	0.27	Low suction pressure	Restart unit, check valves and instrumentation
Recordable	676	10/10/2015	4:30pm	10/10/2015	4:50pm	20min	0.008	1.45	135.48	0.25	2.13	0.54	High level in contactor, pressure swing while reducing level	Reduce liquid level in contactor, line out amine system
Recordable	677	10/12/2015	4:35pm	10/12/2015	5:35pm	1hr	0.008	1.45	135.48	0.25	2.13	0.54	No data on panel to indicate cause of unit shutdown	Reset panel, restart unit
Recordable	680	10/19/2015	4:45pm	10/19/2015	6:05pm	1hr 20min	0.014	2.54	237.09	0.43	3.73	0.95	#3 recompressor down on vibration, low suction to AGI	Restart recompressor, line out plant, reset and restart AGI compressor
Recordable	684	10/31/2015	8:45am	10/31/2015	8:55am	10min	0.006	1.09	101.61	0.19	1.60	0.41	Low suction, reducing liquid level in scrubbers	Drain scrubbers, restart unit
Recordable	685	11/1/2015	10:40am	11/1/2015	10:58am	18min	0.008	1.45	135.48	0.25	2.13	0.54	High suction temperature	Adjust cooler fans
Recordable	686	11/1/2015	2:30pm	11/1/2015	2:36pm	6min	0.006	1.09	101.61	0.19	1.60	0.41	Amine pump shutdown	Restart pump and AGI compressor
Recordable	689	11/6/2015	6:40pm	11/6/2015	7:00pm	20min	0.009	1.64	152.41	0.28	2.40	0.61	Low suction pressure, reducing pressure on contactor	Correct contactor system pressure and flow, restart unit
Recordable	694	11/16/2015	4:00am	11/16/2015	4:07am	7min	0.004	0.73	67.74	0.12	1.07	0.27	Low 1st stage suction pressure, amine still pressure swing	Adjust amine still pressure
Recordable	695	11/16/2015	7:00am	11/16/2015	7:15am	15min	0.011	2.00	186.28	0.34	2.93	0.75	Low 1st stage suction pressure, amine still pressure swing	Adjust amine still pressure
Recordable	699	11/23/2015	10:30pm	11/23/2015	10:45pm	15min	0.006	1.09	101.61	0.19	1.60	0.41	High liquid scrubber levels	Manually drain scrubbers
Recordable	705	12/8/2015	1:40pm	12/8/2015	1:55pm	15min	0.007	1.27	118.54	0.22	1.87	0.48	High liquid scrubber level	Manually drain scrubbers
Recordable	707	12/10/2015	10:35am	12/10/2015	11:15am	40min	0.02	3.64	338.70	0.62	5.33	1.36	High 1st stage suction pressure while changing sock filters	Complete filter change, restart unit
Recordable	708	12/11/2015	10:48pm	12/11/2015	11:08pm	20min	0.017	3.09	287.89	0.53	4.53	1.15	High 3rd stage scrubber level	Manually drain scrubber
Recordable	710	12/16/2015	11:08pm	12/16/2015	11:16pm	8min	0.002	0.36	33.87	0.06	0.53	0.14	No data flagged as to reason for shutdown	Restart and restart unit
Recordable	712	12/19/2015	1:22pm	12/19/2015	1:30pm	8min	0.01	1.82	169.35	0.31	2.67	0.68	Down on vibration	Reset and restart unit
Recordable	714	12/31/2015	11:20am	12/31/2015	11:55am	35min	0.025	4.54	423.37	0.78	6.67	1.70	High 1st stage suction temperature	Adjust cooler fans

Texas Commission on Environmental Quality
Federal Operating Permit Form
PCC - Previous Deviation Reports (Part 2)

Permit Holder Name	Energy Transfer Field Services	**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant	**Account Number**	**PE-0024-Q**
Operating Permit Number	**O-2546**	**Report Submittal Date**	**1/29/2016**
Certification Period Start Date	**07/01/2015**	**End Date**	**12/31/2015**

Identification of Deviation Reports Submitted During the Certification Period
(Note: All reports must be certified to truth, accuracy, and completeness by the Responsible Official)

Report Date	Report Description (Name of unit, Name of Rule, Driver for report, etc)	Report Submitted To	Report Previously Certified? (Y/N)
	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) and attached	Region 7	N

Form PCC: This form for use by Federal Operating Permit holders and may be revised periodically.

WAHA AGI Stream H_2S,SO_2, NO_X, CO and VOC Calculation Sheet

STEERS Incident Number	event #	Date Down	Down Time	Date on	On Time	Total Time (hrs)	Gas Volume (mmscf)	Emissions (lb)					Cause of Flare Event	Corrective Action Taken
								H_2S	SO_2	NO_X	CO	VOC		
216569	630	7/1/2015	8:00am	7/1/2015	10:00pm	14hr	0.1415	25.72	2390.30	4.39	37.72	9.61	Plant shutdown for maintenance	Restart plant, line out plant process, r
216801	631	7/5/2015	10:00am	7/8/2015	4:00pm	78hr	1.9443	353.38	32926.64	60.36	518.35	132.04	Power outage, 3rd party provider, damage to AGI panel as a result of outage/restoration	Restart plant once power was restored, increase volumes, repair AGI panel, restart unit.
217021	632	7/9/2015	4:45pm	7/9/2015	11:45pm	7hr	0.1066	19.37	1805.27	3.31	28.42	7.24	Power outage, 3rd party provider, weather related	Restart plant once power was restored reset and restart AGI unit.
217098	633	7/11/2015	3:05pm	7/9/2015	4:25pm	1hr 20 min	0.0494	8.98	836.50	1.53	13.17	3.35	Low/no flow on oil lubrication system	Replace traybon block on lubricator system
217120	635	7/12/2015	3:00pm	7/12/2015	6:25pm	3hr 15min	0.1061	19.28	1796.80	3.29	28.29	7.21	High coalescer level, transmitter showing false level	I&E reset transmitter in coalescer, restart unit
217212	636	7/13/2015	3:10pm	7/13/2015	10:25pm	7hr 15min	0.2026	36.82	3431.02	6.29	54.01	13.76	High discharge pressure, high coalescer level, misaligned valve indicating valve sequence failure	Drain coalescer, check xmtr, correct valve sequence, restart unit
217761	643	7/25/2015	3:20pm	7/25/2015	5:45pm	2hr 45min	0.089	16.18	1507.21	2.76	23.73	6.04	High 2nd stage discharge pressure, faulty transmitter	Replace transmitter, reset shutdown alarm, restart unit
218076	645	7/31/2015	1:45pm	7/31/2015	6:45pm	5hr	0.0899	12.70	1183.75	2.17	18.64	4.75	Power outage, 3rd party provider	Restart plant and AGI compressor once power was restored
218129	647	8/2/2015	9:45am	8/2/2015	1:45pm	4hr	0.1372	24.94	2323.48	4.26	36.58	9.32	Power outage, 3rd party provider	Restart plant and AGI compressor once power was restored
218383	648	8/5/2015	8:00pm	8/8/2015	10:30am	14hr	0.4884	88.77	8271.03	15.16	130.21	33.17	5th stage outlet valve malfuction, blown fuse, short in electrical junction box	Repair electrical short, replace fuse, restart unit
218450	649	8/7/2015	6:00pm	8/8/2015	12:00am	6hr	0.0824	14.98	1395.44	2.56	21.97	5.60	Power outage, 3rd party provider	Restart plant and AGI compressor once power was restored
218456	650	8/8/2015	6:30pm	8/8/2015	10:30pm	4hr	0.0749	13.61	1268.43	2.33	19.97	5.09	Power outage, 3rd party provider	Restart plant and AGI compressor once power was restored
218715	652	8/12/2015	3:50pm	8/12/2015	6:30pm	3hr 15min	0.0412	7.49	697.72	1.28	10.98	2.80	Hydrate blockage in warm exchanger, plant shutdown	Inject methanol into process stream to eliminate hydrates, restart plant and AGI compressor
218945	655	8/17/2015	3:30pm	8/17/2015	5:10pm	1hr 40 min	0.042	7.63	711.27	1.30	11.20	2.85	Power outage, 3rd party provider	Restart plant and AGI compressor once power was restored
219047	656	8/19/2015	7:25pm	8/19/2015	8:30pm	1hr 5min	0.0343	6.23	580.87	1.06	9.14	2.33	Inlet compressor shutdown on low suction reducing inlet volume to AGI compressor	Restart inlet compressor, establish adequate in let volume, restart AGI compressor
219194	657	8/23/2015	12:00pm	8/23/2015	6:30pm	6h 30min	0.1043	18.96	1766.32	3.24	27.81	7.08	Power outage, 3rd party provider	Restart plant and AGI compressor once power was restored
[illegible]	659	8/31/2015	2:45pm	8/31/2015	4:30pm	1hr 45min	0.0417	7.58	706.19	1.29	11.12	2.83	Power outage, 3rd party provider	Restart plant and AGI compressor once power was restored
[illegible]	661	9/2/2015	8:45am	9/2/2015	2:50pm	6hr 5min	0.0305	7.18	668.93	1.23	10.53	2.68	Power outage, 3rd party provider, recompressor starting issues delayed startup	Repair and restart recompressors and plant, Restart AGI compressor
[illegible]	662	9/2/2015	6:40pm	9/3/2015	6:10am	11hrs 30 min	0.032	5.82	541.92	0.99	8.53	2.17	Low suction pressure, liquid carryover from scrubber to contactor	Clear system of liquids, restart plant, establish adequate inlet volumes
219830	663	9/5/2015	2:00pm	9/5/2015	5:00pm	3hr	0.0364	6.62	616.43	1.13	9.70	2.47	Plant shutdown due to Expander shutdown on surge, AGI shutdown due to foaming in amine system	Pump methanol into cryo system, inject antifoaming agent into amine system, restart plant and AGI
220082	667	9/11/2015	6:00pm	9/14/2015	3:00am	57hr	0.3792	68.92	6421.74	11.77	101.10	25.75	Low suction pressure due to foaming in amine system, gas went off spec, Recompressor down	Stabilize amine system, repair recompressor, reduce inlet gas, recirculate gas
220215	668	9/15/2015	11:30am	9/15/2015	10:40pm	10hr 40min	0.1443	26.23	2443.71	4.48	38.47	9.80	High 2nd and 3rd discharge pressure due to hot valves.	Replace valves as required, restart unit.
220327	671	9/18/2015	1:30am	9/18/2015	10:30am	9hr	0.1356	24.65	2296.38	4.21	36.15	9.21	Plant shutdown on process, AGI shutdown on amine system foaming	Restart plant, line out plant process and amine system, restart AGI compressor
220458	674	9/21/2015	6:45am	9/21/2015	9:15am	3hr 30min	0.076	13.81	1287.06	2.36	20.26	5.16	Low suction pressure due to foaming in amine system	Correct amine system pressure and flow, restart unit
220464	675	9/22/2015	5:00pm	10/9/2015	2:00pm	380hr	2.22	403.49	37595.60	68.92	591.86	150.76	Maintenance, low inlet volumes, 4 recompressor, power outage on startuf, injection well valve	Replace recompressor engine, replace well valve, start plant once power was restored, complete maint.
221565	678	10/13/2015	9:30am	10/13/2015	7:15pm	9hr 45min	0.2156	39.19	3651.18	6.69	57.48	14.64	No data on panel to indicate cause of unit shutdown, shutdown on low glycol circulation	Clear meter flow line, correct program logic on panel, rebuild glycol pump
221752	679	10/17/2015	6:30am	10/17/2015	4:00pm	9hr 30min	0.2541	46.18	4303.17	7.89	67.74	17.26	Low suction pressure, changing sock filters, lube oil pump malfunction	Complete filter change and repair lube oil pump
221980	681	10/21/2015	4:25am	10/21/2015	9:00am	4hrs 35min	0.1534	27.88	2597.82	4.76	40.90	10.42	False liquid level in dehydrator coalescer given by data transmitter	I&E troubleshoot transmitter, check level in coalescer, restart unit
222081	682	10/23/2015	1:00pm	10/24/2015	5:00pm	16hr	0.104	18.90	1761.24	3.23	27.73	7.06	#3 recompressor down for repairs, low inlet volumes, low suction to AGI, amine system	Restart recompressor, line out plant, reset and restart AGI compressor
222388	683	10/29/2015	10:45am	10/30/2015	6:15am	8hr	0.008	1.09	101.61	0.19	1.60	0.41	High suction temperature, high coalescer level	Adjust cooling fans, drain coalescer, restart unit, flared 8hrs during the event.
222465	687	11/2/2015	1:30am	11/2/2015	2:30am	1hr	0.0354	6.43	599.50	1.10	9.44	2.40	High inlet suction temperature	Adjust cooling fans, restart unit
222642	688	11/4/2015	1:45pm	11/4/2015	2:45pm	1hr	0.0424	7.71	718.04	1.32	11.30	2.88	Maintenance, AGI shutdown to update programming logic.	Update programming logic, restart unit.
222760	690	11/8/2015	2:45am	11/8/2015	12:30pm	9hr 45min	0.4612	83.82	7810.40	14.32	122.96	31.32	Shutdown on high rod load	Replace 8 valves on 4th stage and rebuild 4 on 5th stage
222799	691	11/9/2015	4:50pm	11/9/2015	10:00pm	5hr 10min	0.2242	40.75	3798.82	6.96	59.77	15.23	Shutdown on high rod load	Replace 4th and 5th stage valves
222876	692	11/10/2015	2:30pm	11/11/2015	6:50pm	28hr 20min	1.3387	243.31	22670.83	41.56	356.90	90.91	Rod load compression, damaged to 5th stage cylinder and rod	Pull piston and rod, send out for repair, replace rings and rod packing
223009	693	11/13/2015	10:30am	11/13/2015	5:00pm	7hr 30min	0.1172	21.30	1984.78	3.64	31.25	7.96	High 1st stage suction temperature, 3 recompressor shutdown, plant went sour (off-spec gas)	Restart 3 recompressor, recycle gas, line out plant, restart unit
223201	696	11/18/2015	10:00am	11/19/2015	10:00am	24hr		0.00	0.00	0.00	0.00	0.00	High diff. pressure on contactor, shut in gas, absorber pump malfunction, recompressor	Correct all process and mechanical issues, restart unit, Actuals on report, initial only submitted.
223302	697	11/21/2015	11:00pm	11/22/2015	11:00am	12hr	0.0532	9.67	900.94	1.65	14.18	3.61	High liquid scrubber levels, scrubber pump froze (weather)	Manually drain scrubbers as needed
223330	698	11/22/2015	7:15pm	11/22/2015	6:30pm	1hr 15min	0.0293	5.33	496.19	0.91	7.81	1.99	High liquid scrubber levels, scrubber pump froze (weather)	Manually drain scrubbers as needed, pump thawed out
223415	700	11/24/2015	9:30am	11/24/2015	12:30pm	3hr	0.0854	15.52	1446.25	2.65	22.77	5.80	High liquid scrubber levels, panel would not reset	Manually drain scrubbers, I&E techs reset panel
223459	701	11/25/2015	3:30am	11/25/2015	5:30pm	14hr	0.2404	43.69	4071.16	7.46	64.09	16.33	Plant shutdown, Amine system upset, Recompressor startup, scrubber dump system malfunction	Correct all process and mechanical issues, restart unit, see report
223470	702	11/26/2015	10:30pm	11/27/2015	12:45am	2hr 15min	0.0897	16.30	1519.07	2.78	23.91	6.09	Low suction pressure, amine contactor equipment	I&E repaired contactor equipment, unit was resrtarted before repair was made
223474	703	11/27/2015	5:45pm	11/28/2015	1:45am	8hrs	0.1907	34.66	3229.50	5.92	50.84	12.95	Low suction pressure, low inlet volumes, plant process issues	Line out plant, correct operating parameters, establish adequate suction pressure
223761	704	12/1/2015	5:20pm	12/1/2015	7:30pm	2hr 10min	0.0936	17.01	1585.11	2.91	24.95	6.36	1st stage suction scrubber level, False level reading, panel would not allow restart	Attempt restart, restart when panel would allow, I&E checked panel
223943	706	12/7/2015	6:45am	12/7/2015	9:30am	2hr 45min	0.1164	21.16	1971.23	3.61	31.03	7.90	No data flagged as to reason for shutdown	Restart unit when panel allowed
224284	709	12/12/2015	10:15am	12/12/2015	11:15am	55min	0.0394	7.16	667.24	1.22	10.50	2.68	High 4th liquid scrubber level	Manaully drain scrubber
224655	711	12/17/2015	3:00pm	12/18/2015	8:00pm	19hr	0.4177	75.92	7073.73	12.97	111.36	28.37	Lining out plant after cryo shutdown, pressure and volume swings, different shutdowns	Stabilize plant process, change set point on bypass valve to flare to send gas to AGI compressor
224809	713	12/21/2015	3:00pm	12/22/2015	4:30pm	25hr 30min	0.5182	94.18	8775.69	16.09	138.15	35.19	Plant emergency shutdown caused by loss of Delta V controls	Replaced fuses in Delta V, restart plant and AGI, 3rd party assistance

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	Energy Transfer Field Services					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	7/1/2015	**Report Period End Date**	12/31/2015	**Operating Permit Number**	**O2546**	**Report Submittal Date**	1/29/2016

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
FLARE 19			PM	111.111(a)(4)(A)	Monitor Report	514-04-004	Visible	Ongoing

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	7/1/15	12:00a	12/31/15	12:00a	1	Flare not operating under smokeless conditions	Flare replacement project in progress.
Total Deviations:					1	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	Energy Transfer Field Services					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	07/01/2015	**Report Period End Date**	12/31/2015	**Operating Permit Number**	**O2546**	**Report Submittal Date**	1/29/2016

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
WAU26			NOX, CO, VOC	106.512	Monitor	64-CAM-0002	Permit	Daily

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	8/4/15	12:00am	8/4/15	23:59	1	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
2	9/14/15	12:00am	9/15/15	23:59	2	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
3	10/4/15	12:00am	10/5/15	23:59	2	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
4	10/21/15	12:00am	10/26/15	23:59	6	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
5	11/3/15	12:00am	11/10/15	23:59	8	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
6	12/215	12:00am	12/8/15	23:59	7	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)

7	12/15/15	12:00am	12/21/15	23:59	7	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
			Total Deviations:		**33**	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ **YES** ☐ **NO**

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	Energy Transfer Field Services					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	07/01/2015	**Report Period End Date**	12/31/2015	**Operating Permit Number**	**O2546**	**Report Submittal Date**	1/29/2016

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
WAU25			NOX, CO, VOC	106.512	Monitor	64CAM-0003	Permit	Daily

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	8/1/15	12:00a	8/3/15	23:59	3	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
2	9/9/15	12:00a	9/9/15	23:59	1	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
3	9/11/15	12:00a	9/12/15	23:59	2	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
4	10/1/15	12:00a	10/1/15	23:59	4	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
5	11/18/15	12:00a	11/26/15	23:59	9	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
6	12/27/15	12:00a	12/27/15	23:59	1	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)

7	12/31/15	12:00a	12/31/15	23:59	1	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
Total Deviations:					21	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ **YES** ☐ **NO**

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ENERGY TRANSFER

ETC Field Services, LLC

RECEIVED
US EPA, DALLAS, TX
ASSOCIATE DIRECTOR
16 AUG -1 PM 5:49
COMPLIANCE ASSURANCE
& ENFORCEMENT DIV.

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v 3

3001 W. 9th St
Fort Stockton, TX 79735

July 26, 2016

Texas Commission on Environmental Quality
Region 7 Midland
9900 W. I-20
Ste.100
Midland, TX, 79706

Re: Permit Compliance Certification and Semiannual Deviation Report
ETC Field Services
Waha Gas Plant
RN100211408
CN603263823

Attached, please find the January 1-June 30, 2016 Permit Compliance Certification and Deviation Report for the above referenced facility.

Should you require any additional information concerning this submittal, please contact me.

ENERGY TRANSFER

Scott Heysquierdo – Environmental Specialist
3001 W. 9th St. Fort Stockton, TX 79735 | 432-210-9064
Scott.Heysquierdo@EnergyTransfer.com

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION

A. RN: 100211408	B. CN: 603263823	C. Account No.: PE-0024-Q
D. Permit No.: O-2546	E. Project No.:	
F. Area Name: Waha Gas Plant		
G. Company Name: ETC Field Services		

II. CERTIFICATION TYPE *(Please mark the appropriate box)*

A. ☐ Responsible Official:	B. ☒ Duly Authorized Representative:

III. SUBMITTAL TYPE *(Place an "X" in the appropriate box) (Only one response can be accepted per form)*

☐ SOP/TOP Initial Permit Application	☐ Update to Permit Application
☐ GOP Initial Permit Application	☐ Permit Revision, Renewal, or Reopening
☒ Other: Semiannual Deviation Report, Permit Compliance Certification	

IV. CERTIFICATION OF TRUTH

This certification does not extend to information which is designated by the TCEQ as information for reference only.

I, Mark King, certify that I am the DAR for this application
(Certifier Name printed or typed) *(RO or DAR)*

and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period in Section IV.A below, or on the specific date(s) in Section IV.B below, are true, accurate, and complete:

Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).

A. Time Period: From 01/01/2016 to 06/30/2016
*Start Date** *End Date**

OR

B. Specific Dates: _____ _____ _____ _____ _____ _____ _____ _____
*Date 1** *Date 2** *Date 3** *Date 4** *Date 5** *Date 6** *Date 7** *Date 8**

**The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'*

Signature: J. Mark King Signature Date: 7-27-16

Title: Director of Operations

Texas Commission on Environmental Quality
Federal Operating Permit Form
Permit Compliance Certification – PCC (Part 1)

Permit Holder Name	ETC Field Services LLC	**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant	**Account Number**	**PE-0024-Q**
Operating Permit Number	**O - 2546**	**Report Submittal Date**	**7/27/2016**
Certification Period Start Date	**1/1/2016**	**End Date**	**6/30/2016**

I. Certification of Continuous Compliance with Permit Terms and Conditions **(Indicate response by placing a 'x' in the appropriate column for each of the following questions)**	**Response:** Yes	No
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?	☒	☐

II. Summary of Deviations **(Indicate response by placing a 'x' in the appropriate column for each of the following questions)**	**Response:** Yes	No
A. Were there any deviations from any permit requirements during the Certification Period that have *previously* been reported to the agency? If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal. *Important Note:* If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.	☒	☐
B. Were there any deviations from any terms or conditions of the permit during the Certification Period that are *currently* being submitted to the agency? If the answer to this question is 'Yes', please include the relevant reports along with this page.	☒	☐

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	ETC Field Services					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	01/01/2016	**Report Period End Date**	6/30/2016	**Operating Permit Number**	**O2546**	**Report Submittal Date**	7/27/2016

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	**Group ID**							
Flare-19			PM Visible Emissions	111.111(a)(4)(ii)	Monitor Report		Visible Observation	Daily

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	N/A	01/01/16	00:00	01/08/16	00:00	8	Daily observation not performed as required	Perform daily observation and document as required.
2	N/A	01/09/16	00:00	01/10/16	00:00	2	Daily observation not performed as required	Perform daily observation and document as required.
				Total Deviations:		10	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?** ☐ YES ☐ NO	

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	ETC Field Services					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	01/01/2016	**Report Period End Date**	06/30/2016	**Operating Permit Number**	**O2546**	**Report Submittal Date**	7/27/2016

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
WAU25			NOX, CO, VOC	106.512	Monitor	64CAM-0003	Permit	Daily

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	06/05/16	12:00a	06/07/16	23:59	3	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
Total Deviations:					3	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	ETC Field Services					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	01/01/2016	**Report Period End Date**	6/30/2016	**Operating Permit Number**	**O2546**	**Report Submittal Date**	7/27/2016

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
WAU26			NOX, CO, VOC	106.512	Monitor	64-CAM-0002	Permit	Daily

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	1/1/16	12:00am	1/10/16	23:59	10	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
2	1/27/16	12:00am	2/2/16	23:59	7	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
3	2/26/16	12:00am	3/1/16	23:59	4	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
4	3/27/16	12:00am	3/29/16	23:59	3	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
5	6/5/16	12:00am	6/5/16	23:59	1	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)
6	6/7/16	12:00am	6/7/16	23:59	1	Did not record data for: O2 sensor voltage (millivolts), catalyst inlet temperature	Record millivolts and catalyst inlet temperature as required. (Daily Readings.)

Total Deviations:	**25**	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	ETC Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	01/01/2016	**Report Period End Date**	06/30/2016	**Operating Permit Number**	**O2546**	**Report Submittal Date**	7/27/2016

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
FLARE 70		2.F	SO2, H2S, NOx, VOC	101.201	Record	60A-001		

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	01/01/16	12:00a	06/30/16	12:00a	28	See Attached	See Attached
Total Deviations:					28	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

WAHA AGI Stream H_2S,SO_2, NO_X, CO and VOC Calculation Sheet

STEERS Incident Number	event #	Date Down	Down Time	Date on	On Time	Total Time (hrs)	Cause of Flare Event	Corrective Action Taken
Recordable	724	2/7/206	7:40am	2/7/2016	8:15am	35m	1st stage low suction pressure, changing sock filters, xmtr froze up	Replace sock filters, repair transmitter
Recordable	727	2/13/2016	1:48pm	2/13/2016	1:55pm	7m	High 2nd stage discharge pressure, false level indicated by transmitter	Drained liquids from transmitter and restarted unit.
Recordable	729	2/25/2016	6:50pm	2/25/2016	6:58pm	8m	Low suction, filter change	Complete filter change, restart unit
Recordable	730	3/3/2016	8:40am	3/3/2016	9:00am	20m	AGI shutdown to repair tubing leak	Tubing leak repaired, unit restarted
Recordable	732	3/15/2016	5:55am	3/15/2016	6:02am	7m	Low suction pressure, no indication of cause	Reset and restart unit
Recordable	734	3/28/2016	11:32pm	3/28/2016	11:42pm	10m	Power blip	Restart unit
Recordable	739	4/12/2016	9:37am	4/12/2016	9:40am	3m	Power blip	Restart unit
Recordable	744	4/21/2016	6:10pm	4/21/2016	6:30pm	20m	High suction pressure	Lower set point on suction valve
Recordable	745	4/21/2016	9:55pm	4/21/2016	10:05pm	10m	High suction pressure	Place suction valve in manual
Recordable	746	4/22/2016	2:38pm	4/22/2016	2:50pm	12m	High 4th stage discharge pressure	Open louvers on coolers
Recordable	747	4/22/2016	4:00pm	4/22/2016	4:13pm	13m	High 4th stage suction temperature	Tighten fan belts
Recordable	751	5/1/2016	10:08pm	5/1/2016	10:20pm	12m	High suction pressure	Lower set point on suction valve
Recordable	755	5/7/2016	8:12am	5/7/2016	8:22am	10m	Down on vibration due to maintenance	Restart AGI compressor
Recordable	756	5/8/2016	2:28pm	5/8/2016	2:34pm	6m	Motor down on C-01 failure	Reset and restart AGI compressor
Recordable	757	5/11/2016	6:50am	5/11/2016	7:22am	32m	High scrubber levels	Drain scrubber
Recordable	758	5/12/2016	2:30pm	5/12/2016	2:37pm	7m	Low 1st stage suction pressure	Reset and restart AGI compressor
Recordable	760	5/13/2016	5:17pm	5/13/2016	5:32pm	15m	High scrubber level	Drain scrubbers
Recordable	761	5/15/2016	8:23am	5/15/2016	8:29am	6m	High scrubber level	Drain scrubbers
Recordable	762	5/16/2016	9:30am	5/16/2016	9:39am	6m	Powe blip	Reset and restart AGI compressor
Recordable	764	5/20/2016	5:10pm	5/20/2016	5:26pm	16m	Motor down on C-01 failure	Reset and restart AGI compressor
Recordable	766	5/24/2016	2:46pm	5/24/2016	2:51pm	5min	High 1st stage suction temperature	Reduce heat on hot oil/amine system
Recordable	767	6/6/2016	3:05pm	6/6/2016	3:15pm	10m	High 1st stage pressure	Reset panel, restart unit
Recordable	769	6/13/2016	2:50am	6/13/2016	3:00am	10m	High discharge pressure	Restart AGI compressor
Recordable	770	6/13/2016	8:48am	6/13/2016	8:52am	4m	Low suction pressure	Increase suction pressure
Recordable	771	6/13/2016	12:47pm	6/13/2016	12:57pm	10m	High scrubber level	Drain scrubbers
Recordable	782	6/26/2016	6:15am	6/26/2016	6:20am	5m	Low suction	Restart AGI compressor
Recordable	785	6/27/2016	9:00pm	6/27/2016	9:07pm	7m	Low suction pressure	Raise suction set point
Recordable	786	6/27/2016	11:20pm	6/27/2016	11:30pm	10m	High scrubber level	Drain scrubbers

Texas Commission on Environmental Quality
Federal Operating Permit Form
PCC - Previous Deviation Reports (Part 2)

Permit Holder Name	ETC Field Services LLC	**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant	**Account Number**	**PE-0024-Q**
Operating Permit Number	**O-2546**	**Report Submittal Date**	7/27/2016
Certification Period Start Date	01/01/2016	**End Date**	6/30/2016

Identification of Deviation Reports Submitted During the Certification Period
(Note: All reports must be certified to truth, accuracy, and completeness by the Responsible Official)

Report Date	Report Description (Name of unit, Name of Rule, Driver for report, etc)	Report Submitted To	Report Previously Certified? (Y/N)
	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) Attachment	Region 7	N
6/20/2016	30 TAC §101.201 STEERS Incident number 234889	Region 7	N

WAHA AGI Stream H_2S,SO_2, NO_X, CO and VOC Calculation Sheet

STEERS Incident Number	event #	Date Down	Down Time	Date on	On Time	Total Time (hrs)	Cause of Flare Event	Corrective Action Taken
225217	715	1/1/2016	8:30pm	1/1/2016	9:45pm	1hr 15m	Low suction pressure, recompressors shutdown, lube oil and vibration due to pressure swings	Restart recompressors, line out plant, reset and restart AGI compressor
225498	716	1/6/2016	7:10am	1/6/2016	11:10am	4hr	Low suction pressure, amine system/receivng high liquids on Howe inlet	Shut in Howe inlet, drain liquids, restart AGI unit
225675	717	1/9/2016	11:20am	1/9/2016	8pm	34hr	High scrubber level, Scrubber dump auto controller malfunction, unable to reset system	Drain scrubbers, check controller, restart AGI unit
225942	718	1/13/2016	10:15am	1/13/2016	1:15pm	3hr	Maintenance-AGI shutdown to replace flange gaskets and valve	Complete maintenance, reset and restart AGI unit
226091	719	1/16/2016	10:00am	1/16/2016	12:00pm	2hr	Maintenance-AGI shutdown to replace flange gaskets on 2nd stage discharge head	Complete maintenance, reset and restart AGI unit
226102	720	1/18/2016	2:25am	1/18/2016	4:00pm	13hr 35m	AGI system taken out of service due to H2S alarms, maintenance	Shutdown and isolate AGI system, repair tubing leak, restart AGI unit
226475	721	1/23/2016	8:45am	1/23/2016	5:45pm	9hr	Shutdown for inspection/maintenance, bad oil sample, high discharge pressure, valve position	Complete maintenance, adjust injection well valve position
226914	722	1/29/2016	8:45am	1/29/2016	4:45pm	8hr	Low suction pressure	No indication of why the unit went down on low suction pressure
226915	723	1/30/2016	7am	1/30/2016	10:45am	3hr 45m	Low suction pressure	No indication of why the unit went down on low suction pressure
227330	725	2/8/2016	1:40pm	2/8/2016	2:40pm	1hr	AGI shutdown while resetting H2S alarms	Monitor area, reset and restart AGI
227477	726	2/9/2016	9:20pm	2/10/2016	3:20am	6hr	Low 1st stage suction	AGI restarted, valve position and instruments checked. No findings.
228161	728	2/23/2016	9:20am	2/23/2016	1:45pm	4hr 25m	High inlet liquids, carryover to amine contactor	Shut in Howe inlet, drain liquids, restart AGI unit
228737	731	3/4/2016	1:20pm	3/4/2016	3:40pm	2hr 10m	Low suction pressure, low inlet volumes, 3 recompressor down	Restart 3 recompressor, line out plant, restart unit
229563	733	3/22/2016	4:25pm	3/23/2016	4:25pm	24hr	High 4th stage suction temperature due to broken fan belt	Replace fan belt, restart unit
230374	735	4/1/2016	9:00am	4/1/2016	9:00	0	No emission event occurred, maintenance	
230709	736	4/2/2016	1:40pm	4/2/2016	540:pm	4hr	Power outage, 3rd party provider	Restart AGI after power was restored and plant lined out
230711	737	4/3/2016	7:48pm	4/3/2016	8:48pm	1hr	Power outage, 3rd party provider, low suction due to amine pressure	Restart AGI after power was restored and plant lined out
230674	738	4/4/2016	9:15am	4/4/2016	2:45pm	5hr 30m	AGI shutdown to replace pipe spool and repair control valve	Complete work, restart unit
231492	740	4/16/2016	9:30pm	4/17/2016	9:30pm	24hr	MCC transformer failure,high suction pressure, high discharge pressure	Temporary generator, replace suction valves, restart cooling fan
231653	741	4/19/2016	9am	4/19/2016	12pm	3hr	Temporary generator shutdown due to failed fuel valve	Bypass and replace fuel valve
231846	742	4/20/2016	10:20am	4/21/2016	10:05pm	27hr 55m	Temporary generator shutdown, unit left down, tie into purchase power	Place transformer in service, tie into purchase power
231682	743	4/21/2016					Maitenance, AGI was already down, see #742, Incident #231846	
232145	748	4/25/2016	5:30am	4/25/2016	11:30pm	6hr	High 2nd and 3rd stage discharge pressure, hot valves	Replace suction valves
232226	749	4/26/2016	3:20pm	4/26/2016	8:00pm	4hr 40m	Power blip, AGI oil pump breaker tripped	Reset oil pump breaker
232448	750	4/30/2016	3:50pm	4/30/2016	8:50PM	5hr	Low suction pressure, high discharge pressure, changing filter	Reset and restart compressor after filter change, check set point on suction valve
232553	752	5/2/2016	1:15am	5/2/2016	12:15pm	11hr	High suction/discharge pressures, scrubber level, power blip	Place suction valve in manual, drain scrubbers, check level transmitters
232543	753	5/4/2016	7:30am	5/4/2016	2:30pm	7hr	Maintenance-compressor valves, piston, cylinder, packing 5th stage	Maintenance-complete repairs, restart
232786	754	5/5/2016	4:45pm	5/616	1:15am	7hr 30m	Power outage, after restart plant shutdown on high absorber level	Restart plant and AGI compressor
233114	759	5/13/2016	8:00am	5/13/2016	12:00pm	4hr	Maintenance-replace blower belts	Complete maintenance, reset and restart AGI unit
233516	763	5/19/2016	10:45pm	5/20/2016	5:20am	6hr 45m	Power outage	Restart plant and AGI when power was restored
233691	765	5/23/2016	10:00am	5/23/2016	11:35am	1hr 35m	Motor down on C-01 failure	Reset and restart AGI compressor
235413	768	6/9/2016	3:10pm	6/9/2016	4:50pm	1hr 40m	Low suction pressure, amine pressure swing	Establish adequate amine still pressures, Reset and restart AGI compressor.
235758	772	6/13/2016	3:25pm	6/13/2016	6:25pm	3hr	Down on remote shutdown	Reset and restart AGI compressor
235759	773	6/13/2016	6:15pm	6/13/2016	7:15pm	1hr	Amine pressure fluctuations, low suction, high scrubber levels	Establish adequate amine still pressures, drain scrubbers, reset and restart AGI
235798	774	6/15/2016	7:30pm	6/16/2016	12:00am	4hr 30m	Power outage	Restart plant and AGI when power was restored
235839	775	6/16/2016	6:50am	6/16/2016	10:50pm	16hr	Low suction pressure, low inlet volumes, 3 recompressor and expander down	Restart all equipment, line out plant, restart AGI compressor
235898	776	6/17/2016	7:45am	6/18/2016	7:45am	24hr	Power outages	Restart plant and AGI once power was restored, multiple outages
236056	777	6/21/2016	11:45am	6/21/2016	1:55pm	2hr 10m	Power outage	Restart plant and AGI once power was restored
236038	778	6/22/2016	3:30pm	6/22/2016	5:00pm	1hr 30m	Maintenance-test valve	Complete maitenance, restart AGI compressor
236212	779	6/22/2016	5:00pm	6/22/2016	7:15pm	2hr 15m	Low suction pressure, low inlet volume, 3 recompressor down	Restart 3 recompressor, establish adequate inlet, suction volumes
236246	780	6/23/2016	10:30am	6/23/2016	3:40pm	5hr 10m	AGI control building breaker trip	Reset breaker, VFD and contactor
236331	781	6/24/2016	9:00am	6/24/2016	11:30am	2hr 30m	Low suction, high scrubber level	Establish adequate suction pressure, drain scrubbers
236339	783	6/26/2016	3:50pm	6/26/2016	6:10pm	2hr 30m	Low suction, plant on recycle	Restart compressor once plant was in normal operation
236431	784	6/27/2016	2:50am	6/27/2016	2:15pm	11hr 15m	Power Outage	Restart plant and AGI once power was restored
236501	787	6/28/2016	12:50pm	6/28/2016	3:00pm	2hr 10m	High 4th stage discharge pressure	Bypass dehydrator, restart AGI compressor
236628	788	6/29/2016	2:50pm	6/29/2016	4:20pm	1hr 30m	Low suction, recompressor	Restart AGI compressor when recompressor was online

View TCEQ Incident 234889 Regulated Entity: RN100211408 Today's date is: 07/26/2016

14:56

STEERS

Incident Tracking Number:	234889	**Incident Status:**	OPEN
Submittal Type:	FINAL REPORT		
Name of Owner or Operator:	ETC FIELD SERVICES LLC	**Regulated Entity Number:**	RN100211408
Physical Location:	FROM FM 1450, GO 0.5 MI S ON FM 1776, THEN 1 MI W.		
Event/Activity Type:	EMISSIONS EVENT		
Date and Time Event Discovered or Scheduled Activity Start:	05/30/2016 @ 16:00		
Event Duration:	144 hours, 0 minutes		

Process Unit or Area Common Names
Propane Compressor

Facility Common Name	**Facility Identification Number (FIN)**
Propane Compressor	

Emission Point Common Name	**Emission Point Number (EPN)**
Propane Compressor	1

Cause of Emission Event or Excess Opacity Event, or Reason for Scheduled Activity:
Valve was found to be partially open on the #2 propane unit. Discovery date 6/5/2016 4pm.
Actions Taken, or Being Taken, to Minimize Emissions And/or Correct the Situation:
Completely close valve.
Basis Used to Determine Quantities and Any Additional Information Necessary to Evaluate the Event:
Amount released calculation was performed based on pressure, release point size and duration. Conversion factors were used to calculate scf/lbs. This is a non reportable emission event. No affirmative defense is required.

Person Making Notification:	SCOTT HEYSQUIERDO	**Date/Time:**	06/06/2016 01:35:44 PM
Notifier Phone:	432-2109064		
Incident Contact:	SCOTT HEYSQUIERDO		
Contact E-mail:	Scott.Heysquierdo@EnergyTransfer.com		
Contact Phone:	432-2109064		
Notification Jurisdictions:	REGION 07 - MIDLAND		
Affirmative Defense	The owner or operator of the regulated entity asserts this reported event or activity, as applicable, meets the applicable affirmative defense criteria. NO		
Publication Status:	VERIFIED		

Back to Incident List

1 1 0037 526157

V 2

ENERGY TRANSFER

ETC Field Services, LLC

3001 W. 9th St
Fort Stockton, TX 79735

January 31, 2017

Texas Commission on Environmental Quality
Region 7 Midland
9900 W. I-20
Ste.100
Midland, TX, 79706

AI / AI / CO

Re: Permit Compliance Certification and Semiannual Deviation Report
ETC Field Services
Waha Gas Plant
RN100211408
CN603263823

Attached, please find the July 1-December 31, 2016 Permit Compliance Certification and Deviation Report for the above referenced facility.

Should you require any additional information concerning this submittal, please contact me.

ENERGY TRANSFER

Scott Heysquierdo – Environmental Specialist
3001 W. 9th St. Fort Stockton, TX 79735 | 432-210-9064
Scott.Heysquierdo@EnergyTransfer.com

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION

A. RN: 100211408	B. CN: 603263823	C. Account No.: PE-0024-Q
D. Permit No.: O-2546	E. Project No.:	
F. Area Name: Waha Gas Plant		
G. Company Name: ETC Field Services		

II. CERTIFICATION TYPE *(Please mark the appropriate box)*

A. ☐ Responsible Official:	B. ☒ Duly Authorized Representative:

III. SUBMITTAL TYPE *(Place an "X" in the appropriate box) (Only one response can be accepted per form)*

☐ SOP/TOP Initial Permit Application	☐ Update to Permit Application
☐ GOP Initial Permit Application	☐ Permit Revision, Renewal, or Reopening

- ☒ Other: Semiannual Deviation Report, Permit Compliance Certification/LDAR Report

IV. CERTIFICATION OF TRUTH

This certification does not extend to information which is designated by the TCEQ as information for reference only.

I, Mark King, certify that I am the DAR for this application
(Certifier Name printed or typed) *(RO or DAR)*

and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period in Section IV.A below, or on the specific date(s) in Section IV.B below, are true, accurate, and complete:

Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).

A. Time Period: From 07/01/2016 to 12/31/2016
*Start Date** *End Date**

OR

B. Specific Dates: _____ _____ _____ _____ _____ _____ _____ _____
*Date 1** *Date 2** *Date 3** *Date 4** *Date 5** *Date 6** *Date 7** *Date 8**

**The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'*

Signature: Mark King Signature Date: 1-30-17

Title: Director of Operations

Texas Commission on Environmental Quality
Federal Operating Permit Form
PCC - Previous Deviation Reports (Part 2)

Permit Holder Name	ETC Field Services LLC	**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant	**Account Number**	**PE-0024-Q**
Operating Permit Number	**O-2546**	**Report Submittal Date**	**7/27/2016**
Certification Period Start Date	**07/01/2016**	**End Date**	**12/31/2016**

Identification of Deviation Reports Submitted During the Certification Period
(Note: All reports must be certified to truth, accuracy, and completeness by the Responsible Official)

Report Date	Report Description (Name of unit, Name of Rule, Driver for report, etc)	Report Submitted To	Report Previously Certified? (Y/N)
	Flare 70, 30 TAC §101.201 See form Dev Rep (Part 1) Attachment	Region 7	N

Form PCC: This form for use by Federal Operating Permit holders and may be revised periodically.

Texas Commission on Environmental Quality
Federal Operating Permit Form
Permit Compliance Certification – PCC (Part 1)

Permit Holder Name	ETC Field Services LLC	**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant	**Account Number**	**PE-0024-Q**
Operating Permit Number	**O - 2546**	**Report Submittal Date**	**7/27/2016**
Certification Period Start Date	**07/01/2016**	**End Date**	**12/31/2016**

I. Certification of Continuous Compliance with Permit Terms and Conditions **(Indicate response by placing a 'x' in the appropriate column for each of the following questions)**	**Response: Yes**	**No**
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?	☒	☐

II. Summary of Deviations **(Indicate response by placing a 'x' in the appropriate column for each of the following questions)**	**Response: Yes**	**No**
A. Were there any deviations from any permit requirements during the Certification Period that have *previously* been reported to the agency? If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal. *Important Note:* If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.	☒	☐
B. Were there any deviations from any terms or conditions of the permit during the Certification Period that are *currently* being submitted to the agency? If the answer to this question is 'Yes', please include the relevant reports along with this page.	☒	☐

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	ETC Field Services					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	07/01/2016	**Report Period End Date**	12/31/2016	**Operating Permit Number**	**O2546**	**Report Submittal Date**	07/31/2017

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
WAU26			NOX	106.512	Monitor	64CAM-0003	Millivolts	Daily

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	N/A	7/9/16	00:00	7/9/16	00:00	1	O2 sensor equipment malfunction, no data recorded	Correct malfunction, record data as required
2	N/A	7/10/16	00:00	7/10/16	00:00	1	O2 sensor equipment malfunction, no data recorded	Correct malfunction, record data as required
3	N/A	8/25/16	00:00	8/25/16	00:00	1	O2 sensor equipment malfunction, no data recorded	Correct malfunction, record data as required
4	N/A	8/26/16	00:00	8/26/16	00:00	1	O2 sensor equipment malfunction, no data recorded	Correct malfunction, record data as required
5	N/A	8/27/16	00:00	8/27/16	00:00	1	O2 sensor equipment malfunction, no data recorded	Correct malfunction, record data as required
6	N/A	8/28/16	00:00	8/28/16	00:00	1	O2 sensor equipment malfunction, no data recorded	Correct malfunction, record data as required

7	N/A	8/29/16	00:00	8/29/16	00:00	1	O2 sensor equipment malfunction, no data recorded	Correct malfunction, record data as required
8	N/A	8/30/16	00:00	8/30/16	00:00	1	O2 sensor equipment malfunction, no data recorded	Correct malfunction, record data as required
9	N/A	8/31/16	00:00	8/31/16	00:00	1	O2 sensor equipment malfunction, no data recorded	Correct malfunction, record data as required
					Total Deviations:	**9**	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?** ☐ **YES** ☐ **NO**	

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	ETC Field Services					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	07/01/2016	**Report Period End Date**	12/31/2016	**Operating Permit Number**	**O2546**	**Report Submittal Date**	01/31/2017

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
Flare-19			PM Visible Emissions	111.111(a)(4)(ii)	Monitor Report		Visible Observation	Daily

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	N/A	10/01/16	00:00	10/04/16	00:00	4	Daily observation not documented as required	Perform daily observation and document as required.
2	N/A	10/26/16	00:00	10/31/16	00:00	6	Daily observation not documented as required	Perform daily observation and document as required.
3	N/A	11/01/16	00:00	11/01/16	00:00	1	Daily observation not documented as required	Perform daily observation and document as required
4	N/A	11/31/16	00:00	11/31/16	00:00	1	Daily observation not documented as required	Perform daily observation and document as required
				Total Deviations:		12	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	ETC Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	7/01/2016	**Report Period End Date**	12/31/2016	**Operating Permit Number**	**O-2546**	**Report Submittal Date**	1/31/2017

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
FLARE 70		2.F	SO2, H2S, NOx, VOC	101.201	Report	60A-001		

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	See Attach.	7/1/16	12:00a	12/31/16	12:00a	40	See Attachment	See Attachment
				Total Deviations:		40	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?** ☐ **YES** ☐ **NO**	

WAHA AGI Stream H_2S,SO_2, NO_X, CO and VOC Calculation Sheet

STEERS Incident Number	event #	Date Down	Down Time	Date on	On Time	Total Time (hrs)	Cause of Flare Event	Corrective Action Taken
236766	789	7/2/2016	10:00am	7/3/2016	8:45pm	32hr 45min	Plant ESD while working in motor control center	Restart all equipment, line out plant, restart AGI compressor
236775	790	7/4/2016	6:00pm	7/4/2016	8:45pm	2hr 45min	High suction scrubber liquid levels	Manually drain scrubbers, restart AGI compressor
236999	792	7/6/2016	6:25pm	7/6/2016	12:25am	4hr	Power blip, cooling fan tripped and had to be reset	Line out all equipment, reset cooling fan restart unit.
237089	793	7/7/2016	10:20pm	7/7/2016	3:00am	5hr 40min	Power outage, 3rd party provider	Restart plant once power was resotred
237194	794	7/8/2016	12:45pm	7/8/2016	5:45pm	5hr	Power outage, 3rd party provider	Restart plant once power was resotred
237199	795	7/9/2016	4:00am	7/9/2016	6:10pm	14hr 10min	Low suction volume, high suction temperature	Restart recompressor, line out plant, reset and restart AGI compressor
237205	796	7/10/2016	9:00am	7/9/2016	11:00pm	14hr	High suction temperature, reflux fan motor failure	Replace fan motor, restart unit
237273	798	7/11/2016	12:15pm	7/11/2016	8:00pm	7hr 45m	High suction temperature, low suction pressure, amine pressures	Line out amine pressures, repair fan motor.
238634	803	7/13/2016	8:10am	7/13/2016	10:40am	2hr 30min	Low suction pressure, unstable inlet gas volumes	Establish adequate inlet gas volumes, restart unit.
238735	805	7/14/2016	4:15pm	7/14/2016	9:15pm	5hr	Low suction pressure, low inlet volumes, recompressor and expander down	Restart equipment, establish adequate inle4t pressure.
239451 Maint.	810	7/21/2016	1:50pm	7/21/2016	6:50pm	5hr	Maintenance-AGI shutdown to replace actuator valve	Complete work, restart unit
239536	811	7/23/2016	11:00pm	7/22/2016	8:00pm	21hr	Power breaker tripped due to a faulty wire	Repair/replace wire, lug and breaker.
240489	822	7/31/2016	7:45pm	7/31/2016	8:37pm	52min	High suction scrubber liquid levels	Manually drain scrubbers
240582	824	8/2/2016	6:40am	8/2/2016	5:00pm	10hr 20min	C-01 motor failure, blown fuse on VFD	Replace fuse holder and fuse
240767	826	8/3/2016	6:15pm	8/3/2006	9:30pm	3hr 15min	High 5th stage scrubber liquid levels	Drain 5th stage scrubber
240800	828	8/5/2016	9:00am	8/5/2016	11:00am	2hr	Planned maintenance was cancelled. No event.	
241950	831	8/19/2016	2:30pm	8/20/2016	3:30pm	25hr	Power outage, Blown fuses on VFD	Replace fuses. Restart unit once powe was restored
241999 Maint.	833	8/23/2016	9:00am	8/23/2016	2:00pm	5hr	AGI shutdown to inspect dump valves, tubing and replace relief valve	Complete work, restart unit
242114	834	8/23/2016	6:00pm	8/23/2016	7:50pm	1hr 50min	AGI shutdown to repair tubing leak	Repair tubing leak, restart unit
242115	835	8/23/2016	8:25pm	8/23/2016	11:15pm	2hr 50min	Power outage, 3rd party provider, VFD reset	Once power was restored, reset VFD, restart unit
242237	836	8/24/2016	1:00pm	8/24/2016	6:00pm	5hr	AGI compressore shutdown to repair 5th stage valve	Repair valve, reset and restart unit
243154	839	9/7/2016	8:15pm	9/8/2016	12:15am	4hr	Power outage, 3rd party provider	Reset breaker, VFD and compressor unit once power was restored.
243893	840	9/15/2016	1:15pm	9/15/2016	6:48pm	6hr 33min	Power outage, 3rd party provider	Restart unit once power was restored
243951	841	9/16/2016	7:15pm	9/16/2016	11:15pm	4hr	Power outage, 3rd party provider	Restart unit once power was restored
243957	843	9/17/2016	5:15pm	9/17/2016	9:15pm	4hr	Shutdown on cooler vibration	Repair cooler, restart unit.
244165	844	9/20/2016	10:15am	9/20/2016	3:45pm	5hr 30m	Power outage, 3rd party provider	Restart plant once power was restored
245091	849	10/5/2016	1:10pm	10/5/2016	3:46pm	2hr 36min	High inlet temperature	Lower heat on hot oil and waster heat recovery systems
245717	854	10/19/2016	6:00am	10/19/2016	8:50am	2hr 50min	Low 4th stage suction pressure	Check pressure transmitter, false reading, Clear transmitter, reset, restart unit
245849	855	10/21/2016	1:00am	1021/2016	10:00am	9hr	Low 4th stage suction pressure	Replace 4th stage suction pressure transmitter
245865	856	10/21/2016	1:20pm	10/21/2016	3:20pm	2hr	High rod load alarm. Shurdown unit for maintenance.	Replace 4th and 5th stage valves
247166	868	11/16/2016	3:00am	11/16/2016	6:30am	3hr 30min	No flow right bank lubricator	Clear lubricator lines, restart unit
247245	869	11/17/2016	1:00am	11/17/2016	11:30am	10hr 30min	No flow right bank lubricator	Clear/clean lubricator lines, replace oil filters, restart unit
247789 Maint.	883	11/29/2016	1:40am	12/1/2016	6:00pm	36hr 20min	Plant shutdown for maintenance	Restart plant, line out process, restart AGI compressor
248068	884	12/2/2016	5:00am	12/3/2016	3:00pm	34hr	Plant startup	Start equipment, line out processes, restart AGI compressor
248728	885	12/6/2016	1:00am	12/8/2016	4:15am	51hr 15min	High inlet liquids, plant shutdown	Shut in all inlet streams, Reduce equipment liquid levels, restart plant, line out processes
248470	889	12/10/2016	8:40pm	12/10/2016	9:50pm	1hr 10min	High 4th stage discharge temperature	Reset and restart unit
248979	896	12/18/2016	10:53pm	12/20/2016	8:25pm	46hr 28min	High suction and scrubber levels, lube oil pump motor breaker failure/blown/burnec	Replace lube oil pump motor breaker, restart unit
249295	898	12/22/2016	9:30am	12/22/2016	11:00am	1hr 30min	Low suction pressure	Place suction controller in manual
249326	899	12/23/2016	6:15am	12/23/2016	9:15am	3hr	High scrubber levels	Manually drain scrubbers
249233	902	12/24/2016	5:35pm	1/2/2016	2:00pm	212hr 25min	High discharge line pressure to injection well. (hydrate)	Pump fluid into well to eliminate hydrate, heat discharge line

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	ETC Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	07/01/2016	**Report Period End Date**	12/31/2016	**Operating Permit Number**	**O2546**	**Report Submittal Date**	01/31/2017

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
FLARE 70		2.F	SO2, H2S	101.201	Record	60A-001		

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	7/1/16	12:00a	12/31/16	12:00a	73	See Attached	See Attached
Total Deviations:					73	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

WAHA AGI Stream H_2S,SO_2, NO_X, CO and VOC Calculation Sheet

STEERS Incident Number	event #	Date Down	Down Time	Date on	On Time	Total Time (hrs)	Cause of Flare Event	Corrective Action Taken
236856 Rec.	791	7/5/2016	1:44am	7/5/2016	2:29:am	45min	High 3rd stage suction pressure	Drain scrubbers, restart unit
Recordable	797	7/11/2016	1:45am	7/11/2016	2:00am	15min	High scrubber levels	Drain scrubbers
Recordable	800	7/12/2016	8:44am	7/12/2016	8:52am	8min	High scrubber levels	Drain scrubbers
Recordable	801	7/12/2016	10:00am	7/12/2016	10:30am	30min	Low 2nd stage suction pressure	Raise suction set point
Recordable	802	7/12/2016	8:00pm	7/12/2016	8:15pm	15min	High scrubber levels	Drain scrubbers
Recordable	804	7/13/2016	7:00pm	7/13/2016	7:15pm	15min	Low 1st stage suction	Raise pressure on amine still
Recordable	806	7/15/2016	8:25am	7/15/2016	8:30am	5min	Low 1st stage suction pressure	Restart unit
Recordable	807	7/16/2016	7:30am	7/16/2016	7:40am	10min	Power blip	Restart unit once power was restored
Recordable	808	7/18/2016	4:08am	7/18/2016	4:11am	3min	Low 1st stage suction while dumping scrubbers	Drain scrubbers, restart unit
239395 Rec	809	7/20/2016	9:10am	7/20/2016	12:20pm	3hr 10min	High scrubber liquid levels	Manually drain scrubbers
Recordable	812	7/25/2016	4:20pm	7/25/2016	4:25pm	5min	High scrubber levels	Drain scrubbers
Recordable	813	7/26/2016	1:19am	7/26/2016	1:28am	9min	Low 1st stage suction pressure	Raise suction pressure set point
Recordable	814	7/26/2016	9:45am	7/26/2016	9:50am	5min	Low 3rd stage suction pressure, draining scrubbers	Close drain, restart unit
Recordable	815	7/27/2016	10:10am	7/27/2016	10:20am	10min	Amine system pressure swing	Stabilize amine system pressure
Recordable	816	7/27/2016	2:10pm	7/27/2016	2:20pm	10min	High scrubber level, maintenance on level transmitter	Reset panel, restart unit
Recordable	817	7/28/2016	6:12pm	7/28/2016	6:22pm	10min	High 1st stage suction scrubber level	Drain scrubbers
Recordable	818	7/29/2016	12:53pm	7/29/2016	12:58pm	5min	Placing AGI dehydrator in service	Restart unit
Recordable	819	7/30/2016	6:05am	7/30/2016	6:08am	3min	High 3rd stage scrubber level	Drain scrubbers
Recordable	820	7/30/2016	1:40pm	7/30/2016	2:25pm	45min	Power blip	Restart unit once power was restored
Recordable	821	7/31/2016	5:35am	7/31/2016	5:51am	16min	High 1st stage scrubber level	Drain scrubbers and sour water tank
Recordable	823	7/31/2016	10:27pm	7/31/2016	10:34pm	7min	Power blip	Restart unit once power was restored
Recordable	825	8/3/2016	4:35pm	8/3/2016	5:00pm	25min	Low suction pressure	Place suction valve in manual
Recordable	827	8/4/2016	10:58am	8/4/2016	11:14am	16min	High scrubber level, pump motor failure	Replace pump motor, drain scrubbers
Recordable	829	8/6/2016	3:40am	8/6/2016	3:45am	5min	Low 2nd stage suction pressure	Raise setpoint on suction pressure
Recordable	830	8/17/2016	4:55pm	8/17/2016	5:15pm	20min	Power blip	Restart unit once power was restored
Recordable	832	8/21/2016	3:20pm	8/21/2016	3:35 AM	15min	High scrubber levels	Drain scrubbers
Recordable	837	8/25/2016	5:48pm	8/25/216	5:54pm	6min	Power blip	Restart unit once power was restored
Recordable	838	9/6/2016	7:57am	9/6/2016	8:00am	3min	Low 1st stage suction	Raised suction pressure set point
Recordable	842	9/17/2016	4:50am	9/17/2016	4:58am	8min	Shutdown on vibration	Restart unit.
Recordable	845	9/25/2016	11:52pm	9/25/2017	11:55pm	3min	Low 1st stage suction pressure	Reset and restart unit
Recordable	846	9/26/2016	10:47pm	9/26/2016	10:57pm	10min	High 1st stage scrubber level	Drain scrubbers
Recordable	847	9/28/2016	1:25pm	9/28/2016	1:35pm	10min	High scrubber level, 2nd stage scrubber obstructed	Clear obstruction, drain scrubber, restart unit
Recordable	848	10/4/2016	7:10pm	10/4/2016	8:00pm	50min	Power blip	Restart plant once power was restored
Recordable	850	10/15/2016	11:14pm	10/15/2016	11:24pm	10min	Low suction pressure	Raise suction pressure set point
Recordable	851	10/17/2016	6:15am	10/17/2016	6:20am	5min	Low suction pressure	Check unit, reset and restart
Recordable	852	10/17/2016	9:15am	10/17/2016	9:30am	15min	Power blip	Restart plant once power was restored
Recordable	853	10/18/2016	2:10pm	10/18/2016	2:25pm	15min	Power blip	Restart plant once powet was restored
Recordable	857	10/27/2016	10:14am	10/27/2016	10:24am	10min	Low suction pressure	Reaised suction pressure set point
Recordable	858	10/29/2016	5:10am	10/29/2016	5:20am	10min	High 3rd stage scrubber level	Manually drain scrubber
Recordable	859	10/29/2016	12:55pm	10/29/2016	1:26pm	31min	Low 2nd stage discharge pressure	Adjust suction setpoint
Recordable	860	11/1/2016	2:55am	11/1/2016	3:25am	30min	Low suction pressure while changing filters	Complete filter change, restart unit
Recordable	861	11/1/2016	9:58am	11/1/2016	10:02am	4min	High suction temperature	Lower inlet suction temperarture
Recordable	862	11/9/2016	8:10am	11/9/2016	8:20am	10min	Low 1st stage suction pressure	Reset and restart unit
Recordable	863	11/10/2016	4:50am	11/10/2016	4:54am	4min	Low 1st stage suction pressure	Reset and restart unit
Recordable	864	11/10/2016	10:40am	11/10/2016	10:45am	5min	Low 1st stage suction pressure	Reset and restart unit
Recordable	865	11/11/2016	11:23pm	11/11/2016	11:28pm	5min	Low 1st stage suction pressure	Reset and restart unit, place suction controller in manual.
Recordable	866	11/11/2016	11:42pm	11/11/2016	11:50pm	8min	Low 1st stage suction pressure	Reset and restart unit
Recordable	867	11/15/2016	12:42am	11/15/2016	12:46am	4min	Low 1st stage suction pressure	Reset and restart unit, place suction controller in manual.
Recordable	870	11/17/2016	12:57pm	11/17/2016	1:04pm	7min	High 4th stage scrubber level	Drain scrubber
Recordable	871	11/20/2016	1:24pm	11/20/2016	1:28pm	4min	High 4th stage scrubber level	Drain scrubber
Recordable	872	11/23/2016	6:45am	11/23/2016	6:55am	10min	Plant process upset	Line out plant processes, restart unit
Recordable	873	11/23/2016	2:00pm	11/23/2016	2:07pm	7min	Low 2nd stage discharge pressure	Adjust suction setpoint
Recordable	874	11/24/2016	11:30am	11/24/2016	11:38am	8min	High 1st stage scrubber level	Drain scrubber
Recordable	875	11/25/2016	3:45pm	11/25/2016	3:52pm	7min	Low suction pressure	Place suction controller in manual
Recordable	876	11/25/2016	4:02pm	11/25/2016	4:05pm	3min	Low suction pressure	Reset and restart unit
Recordable	877	11/25/2016	4:32pm	11/25/2016	4:38pm	6min	Low suction pressure	Reset and restart unit
Recordable	878	11/25/2016	7:10pm	11/25/2016	7:15pm	5min	Low suction pressure	Reset and restart unit

WAHA AGI Stream H_2S,SO_2, NO_X, CO and VOC Calculation Sheet

STEERS Incident Number	event #	Date Down	Down Time	Date on	On Time	Total Time (hrs)	Cause of Flare Event	Corrective Action Taken
Recordable	879	11/26/2016	10:04am	11/26/2016	10:09am	5min	High suction temperature	Place additional fan in service to lower suction temp, place AGI compressor back in service
Recordable	880	11/26/2016	10:35am	11/26/2016	10:39am	4min	Low 1st stage suction	Place suction controller in manual
Recordable	881	11/26/2016	10:50am	11/26/2016	11:04am	14min	Low 1st stage suction	Reset and restart unit
Recordable	882	11/26/2016	1:27pm	11/26/2016	1:36pm	9min	Low 1st stage suction	Place suction controller in manual
Recordable	886	12/8/2016	9:30am	12/8/2016	10:00am	30min	High 1st stage suction pressure	Reset and restart unit
Recordable	887	12/9/2016	9:24pm	12/9/2016	9:33pm	9min	Low 1st stage suction	Reset and restart unit
Recordable	888	12/10/2016	2:50am	12/10/2016	3:20am	30min	High 1st stage suction temperature	Adjust reflux temperature, restart unit
Recordable	890	12/11/2016	11:32am	12/11/2016	11:39am	7min	High 1st stage suction temperature	Placed additional reflux condenser in service
Recordable	891	12/13/2016	11:59pm	12/14/2016	12:05am	6min	Low 1st stage suction pressure	Place suction controller in manual
Recordable	892	12/13/2016	3:25am	12/13/2016	3:30am	5min	Low 1st stage suction pressure	Suction controller in manual, reset and restart unit
Recordable	893	12/15/2016	5:34am	12/15/2016	5:46am	13min	High 1st stage scrubber level	Drain scrubber
Recordable	894	12/16/2016	10:42pm	12/16/2016	10:49pm	7min	High 1st stage scrubber level	Drain scrubber
Recordable	895	12/17/2016	12:20pm	12/17/2016	1:10pm	50min	Amine pressure fluctuations, maintenance being performed on level transmitters	Complete maintenance, stabilize pressures
Recordable	897	12/21/2016	9:00am	12/21/2016	9:09am	9min	High 1st stage scrubber levels	Drain 1st stage scrubbers
Recordable	900	12/24/2016	4:15am	12/24/2016	4:25am	10min	High 3rd stage scrubber level	Manually drain scrubber
Recordable	901	12/24/2016	10:03am	12/24/2016	10:08am	5min	High suction temperature	Adjust reflux cooler fans

1100375261 57

RECEIVED
US EPA, DALLAS, TX
ASSOCIATE DIRECTOR
17 AUG -1 PM 12:00
COMPLIANCE ASSURANCE
& ENFORCEMENT DIV.

TX V3

ENERGY TRANSFER

ETC Field Services, LLC

3001 W. 9th St
Fort Stockton, TX 79735

June 28, 2017

AI / AI / CO

Texas Commission on Environmental Quality
Region 7 Midland
9900 W. I-20
Ste.100
Midland, TX, 79706

Re: Permit Compliance Certification and Semiannual Deviation Report
ETC Field Services
Waha Gas Plant
RN100211408
CN603263823

Attached, please find the January 1-June 30, 2017 Permit Compliance Certification and Deviation Report for the above referenced facility.

Should you require any additional information concerning this submittal, please contact me.

ENERGY TRANSFER

Scott Heysquierdo – Environmental Specialist
3001 W. 9th St. Fort Stockton, TX 79735 | 432-210-9064
Scott.Heysquierdo@EnergyTransfer.com

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION

A. RN: 100211408	B. CN: 603263823	C. Account No.: PE-0024-Q
D. Permit No.: O-2546	E. Project No.:	
F. Area Name: Waha Gas Plant		
G. Company Name: ETC Field Services		

II. CERTIFICATION TYPE *(Please mark the appropriate box)*

A. ☒ Responsible Official:	B. ☐ Duly Authorized Representative:

III. SUBMITTAL TYPE *(Place an "X" in the appropriate box) (Only one response can be accepted per form)*

☐ SOP/TOP Initial Permit Application	☐ Update to Permit Application
☐ GOP Initial Permit Application	☐ Permit Revision, Renewal, or Reopening

• ☒ Other: Semiannual Deviation Report, Permit Compliance Certification/LDAR Report

IV. CERTIFICATION OF TRUTH

This certification does not extend to information which is designated by the TCEQ as information for reference only.

I, Greg McIlwain, certify that I am the Responsible Official for this application.

and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period in Section IV.A below, or on the specific date(s) in Section IV.B below, are true, accurate, and complete:

Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).

A. Time Period: From 01/01/2017 to 06/30/2017
*Start Date** *End Date**

OR

B. Specific Dates: _____ _____ _____ _____ _____ _____ _____ _____
*Date 1** *Date 2** *Date 3** *Date 4** *Date 5** *Date 6** *Date 7** *Date 8**

**The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'*

Signature: Greg McIlwain Signature Date: 7/26/17

Title: V.P. OPERATIONS

Texas Commission on Environmental Quality
Federal Operating Permit Form
Permit Compliance Certification – PCC (Part 1)

Permit Holder Name	ETC Field Services LLC	**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant	**Account Number**	**PE-0024-Q**
Operating Permit Number	**O - 2546**	**Report Submittal Date**	**7/28/2017**
Certification Period Start Date	**1/1/2017**	**End Date**	**6/30/2017**

I. Certification of Continuous Compliance with Permit Terms and Conditions **(Indicate response by placing a 'x' in the appropriate column for each of the following questions)**	**Response:** Yes	No
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?	☒	☐

II. Summary of Deviations **(Indicate response by placing a 'x' in the appropriate column for each of the following questions)**	**Response:** Yes	No
A. Were there any deviations from any permit requirements during the Certification Period that have *previously* been reported to the agency? If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal. *Important Note:* If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.	☒	☐
B. Were there any deviations from any terms or conditions of the permit during the Certification Period that are *currently* being submitted to the agency? If the answer to this question is 'Yes', please include the relevant reports along with this page.	☒	☐

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	ETC Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	01/01/2017	**Report Period End Date**	06/30/2017	**Operating Permit Number**	**O-2546**	**Report Submittal Date**	07/28/2017

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
FLARE 70		2.F	SO2, H2S, NOx, VOC	101.201	Report	60A-001		

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	See Attach.	1/1/17	12:00a	6/30/17	12:00a	38	See Attachment	See Attachment
Total Deviations:						**38**	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

WAHA AGI Stream H_2S,SO_2, NO_X, CO and VOC Calculation Sheet

STEERS Incident Number	event #	Date Down	Down Time	Date on	On Time	Total Time (hrs)	Gas Volume (mmscf)	Cause of Flare Event	Corrective Action Taken
249773	903	1/3/2017	3:15pm	1/6/2017	3:30pm	72hr 15m	3.1068	High discharge pressure, high downhole pressure on injection well, hydrate	Pump fluids into well to eliminate hydrate reducing pressure
250045	904	1/6/2017	8:25pm	1/8/2017	4:30pm	44hr 5m	0.8195	High scrubber levels, panel malfunction, lube oil pump motor failed	Replace scrubber pump, reset panel, replace prelube oil pump
250096	905	1/9/2017	2:15pm	1/9/2017	6:00pm	3hr 45m	0.0933	High 3rd stage scrubber level	Manually drain scrubbers, restart unit
250249	906	1/10/2017	2:25pm	1/10/2017	5:10pm	2hr 45m	0.0703	High 3rd stage scrubber level	Manually drain scrubbers, replace electric pump motor
250289	907	1/11/2017	2:00pm	1/11/2017	8:20pm	6hr 20m	0.1287	High 3rd asnd 4th stage scrubber level	Manually drain scrubbers, Drain liquid level out of dehy skid contactor
250377	908	1/12/2017	3:27pm	1/13/2017	12:23am	8hr 56m	0.051	High 3rd stage scrubber level	Manaully drain scrubber, I&E check system, restart unit
250648	912	1/18/2017	6:50am	1/18/2017	9:50am	3hr	0.0662	High 3rd stage scrubber level	Manually drain scrubbers
251305	920	1/27/2017	7:20pm	1/28/2017	2:20am	6hr 50m	0.2118	High rod load alarm	Unit reset, Replace 4th and 5th stage comprosser valves
251307	921	1/28/20107	6:10am	1/28/2017	5:06pm	10hr 56m	0.1558	High rod load alarm, unit shutdown to replace 5th stage piston rings	Replace 5th stage compressor piston rings, restart unit
252163	932	2/9/2017	12:50pm	2/10/2017	12:20am	11hr 30m	0.4137	Maintenance, replace 2nd, 4th compressor vlaves, inspect and replace 5th stage piston rings	Complete manitenance, restart unit
252256	936	2/11/2017	6:30pm	2/11/2017	2:00am	8hr 30m	0.2096	AGI shutdown to inspect/repair 2nd stage controller, amine fluctuation, plant process upset	Complete maintenance and inpsection, line out process, restart unit
252273	937	2/14/2017	6:00am	2/18/2017	8:00pm	116hr	0.41704	Maintenance, plant shutdown	Complete maintenance, restart plant, line out process, restart AGI compressor
252636	941	2/20/2017	1:30pm	2/20/2017	10:30pm	9hr	0.3416	Maintenance, AGI shutdown to investigate knock in 2nd stage #6 cylinder	Replace piston rings and right bank flow switch
252892	942	2/21/2017	7:15am	2/21/2017	9:30am	2hr 15min	0.0787	AGI shutdown to replace gasket on dehydrator skid	Replace gasket, restart unit
253880	949	3/9/2017	9:00am	3/9/2017	1:00pm	4hr	0.1329	Maintenance-Inspect and clean 2nd stage dump valve	Complete maintenance and inpsection, restart unit
254144	958	3/13/2017	9:23am	3/13/2017	11:03am	1hr 40min	0.0606	Tech working on temperature probe	Complete repair, restart unit
254327	965	3/16/2017	10:55am	3/16/2017	2:55pm	4hr	0.0389	High 3rd stage scrubber level, low suction pressure	Drain scrubbers, stabilize amine system pressure
254387	972	3/19/2017	12:00pm	3/19/2017	9:45pm	9hr 45min	0.1429	Low suction pressure, High suction temperature	Correct suction pressure, Raise set point an amine flash drum, adjust suction controller
255702	980	4/6/2017	8:50am	4/6/2017	11:30am	2hr 40m	0.172	Maintenance-Repair Dehy, install new level transmitter	Complete maintenance, restart AGI compressor
255894	981	4/8/2017	11:00am	4/8/2017	12:10pm	1hr 10min	0.052	AGI shutdown for maintenance on the coalecser piping	Complete maintenance, restart AGI compressor
256203	982	4/11/2017	8:30am	4/11/2017	11:35am	3hr 5min	0.192	Maintenance-Shutdown AGI to replace 5th stage cylinder pressure packing	Complete manitenance, restart AGI compressor
256497	985	4/16/2017	5:55pm	4/16/2017	9:10pm	3hr 15min	0.183	High 5th stage discharge temperature	Check fans, louvers, transmitter and temperature probe, restart unit
256546	986	4/18/2017	8:15am	4/18/2017	1:45pm	5hr 10min	0.255	Maintenance-AGI shutdown to repair tubing lines	Repair tubing lines, restart unit
257832	994	5/14/2017	3:30pm	5/14/2017	4:00pm	15min	0.011	Low 1st stage suction pressure	Place amine still back pressure controller in manual
257832	995	5/14/2017	4:25pm	5/14/2017	6:25pm	2hr 15min	0.082	High scrubber level, low suction pressure	Drain scrubbers, place controller in manual
257932	997	5/15/2017	6:30pm	5/15/2017	7:30pm	1hr	0.034	High 1st stage suction temperature	Adjust cooling fans, restart unit
257978	998	5/16/2017	4:15am	5/16/2017	7:15am	3hr	0.097	4 recompressor shutdown causing plant upset	Restart 4 recompressor, line out process, reset and restart AGI compressor
258225	999	5/18/2017	10:15pm	5/19/2017	3:15am	5hr	0.227	High discharge pressure	Change out 3rd stage compressor (poppet) valves
258769	1003	5/25/2017	6:30pm	5/25/2017	7:40pm	1hr 10min	0.076	No flow right lubricator	Check oil level, change lubricator filters, prime lubricators, restart unit
258880	1005	5/27/2017	1:45pm	5/27/2017	3:00pm	1hr 15m	0.06	3 recompressor shutdown causing plant upset	Restart 3 recompressor, line out process, reset and restart AGI compressor
260105	1023	6/10/2017	2:22am	6/10/2017	4:22am	2hr	0.105	No flow right bank lubricator	Check oil level, change lubricator filters, prime lubricators, restart unit
260112	1026	6/11/2017	4:10pm	6/11/2017	4:40pm	30min	0.031	Glycol pump shutdown. Prelube pump would not restart	Reset breaker on glycol pump, restart prelube pump, reset and restart AGI
260445	1028	6/16/2017	1:30pm	6/16/2017	3:55pm	2hr 25m	0.107	High 1st stage suction temperature, scrubber levels	Reduce temperature of hot oil through WHR. Shut off burners, drain scrubbers
260621	1030	6/20/2017	11:50am	6/20/2017	3:20pm	3hr 30min	0.127	High 1st stage suction temperature	Reduce temperature of hot oil through WHR. Shut off burners
261153	1035	6/25/2017	9:10am	6/25/2017	10:00am	50min	0.031	Amine reboiler pressure swing, amine pump shutdown	Line out amine process, restart pumps
262142	1042	6/29/201	5:00pm	6/29/2017	8:33pm	3hr 35min	0.099	High lube oil temperature	Change oil and replace thermostat
262199	1043	6/30/2017	N/A	6/30/2017	xxx	xxx	0	Event covered in #262203	N/A
262203	1044	6/30/2017	12:30pm	6/30/2017	8:00pm	7hr	0.169	High lube oil temperature	Change oil and replace thermostat

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name	ETC Field Services LLC					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	01/01/2017	**Report Period End Date**	06/30/2017	**Operating Permit Number**	**O2546**	**Report Submittal Date**	7/28/2017

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
FLARE 70		2.F	SO2, H2S, NOx, VOC	101.201	Record	60A-001		

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
1	01/01/17	12:00a	06/30/17	12:00a	104	See Attached	See Attached
Total Deviations:					104	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

WAHA AGI Stream H_2S,SO_2, NO_X, CO and VOC Calculation Sheet

STEERS Incident Number	event #	Date Down	Down Time	Date on	On Time	Total Time (hrs)	Gas Volume (mmscf)	Cause of Flare Event	Corrective Action Taken
Recordable	909	1/13/2017	6:05am	1/13/2017	6:13am	8min	0.007	High 3rd stage scrubber level	Manually drain scrubbers
Recordable	910	1/13/2017	9:57am	1/13/2017	10:09am	12min	0.015	High 3rd stage scrubber level	Manually drain scrubbers
250418 Rec.	911	1/15/2017	11:50am	1/15/2017	12:35pm	1hr 5min	0.0217	Absorber pump malfunction	Repair pump, restart unit
Recordable	913	1/22/2017	1:00pm	1/22/2017	1:07pm	7min	0.008	High 4th stage scrubber level	Manually drain scrubbers
Recordable	914	1/22/2017	4:25pm	1/22/2017	4:32pm	7min	0.008	High 4th stage scrubber level	Manually drain scrubbers
Recordable	915	1/23/2017	11:09am	1/23/2017	11:11am	2min	0.002	High 4th stage scrubber level	Manually drain scrubbers
Recordable	916	1/23/2017	11:52am	1/23/2017	11:59am	7min	0.007	High 4th stage scrubber level	Manually drain scrubbers
Recordable	917	1/23/2017	4:05pm	1/23/2017	4:14pm	9min	0.009	High 4th stage scrubber level, level transmitter checked	Manually drain scrubbers, order parts for level transmitter
Recordable	918	1/24/2017	2:14pm	1/24/2017	2:22pm	9min	0.009	High 4th stage scrubber level	Manually drain scrubbers
Recordable	919	1/25/2017	10:19am	1/25/2017	10:26am	7min	0.005	High 3rd stage scrubber level	Manually drain scrubbers, check controller programming
Recordable	922	1/29/2017	9:47am	1/29/2017	10:15am	32min	0.024	High 1st stage suction temperature	Reduce reflux temperature, restart unit
Recordable	923	1/30/2017	3:01pm	1/30/2017	3:40pm	39min	0.019	High 1st stage discharge temperature	Blowdown transmitter (water), restart unit
Recordable	924	1/31/2017	11:06am	1/31/2017	11:12am	6min	0.004	Low 1st stage suction pressure	Amine pressure fluctuation while tuning the amine system
Recordable	925	2/2/2017	10:05am	2/2/2017	10:20am	15min	0.008	Power blip	Restart unit
Recordable	926	2/3/2017	10:05am	2/3/2017	10:50am	45min	0.018	Low 1st stage suction while changing amine filters	Change filters, restart unit
Recordable	927	2/4/2017	12:15am	2/4/2017	12:21am	6min	0.004	Low 1st stage suction pressure, false level reading on transmitter	Blowdown transmitter, restart unit
Recordable	928	2/4/2017	1:40pm	2/4/2017	2:20pm	40min	0.026	TEG pump swap, pressure fluctuation	Start pumps and restart unit
Recordable	929	2/4/2017	11:32pm	2/4/2017	11:38pm	6min	0.006	Low 1st stage suction pressure, false level reading on transmitter	Blowdown transmitter, restart unit
Recordable	930	2/4/2017	11:49pm	2/5/2017	12:01am	11min	0.005	Low 1st stage suction pressure, false level reading on transmitter	Blowdown transmitter, restart unit
Recordable	931	2/5/2017	1:02am	2/5/2017	1:07am	5min	0.003	Low suction pressure, amine pressure	Level out amine system pressure, restart unit
Recordable	933	2/10/2017	2:30am	2/10/2017	2:35am	5min	0.005	Low 1st stage suction pressure	Restart unit
Recordable	934	2/11/2017	3:33am	2/11/2017	3:38am	5min	0.003	Low 1st stage suction pressure	Restart unit
Recordable	935	2/11/2017	12:55pm	2/11/2017	1:15pm	20min	0.016	High 3rd, 4th stage scrubber level, 2nd stage dump hung open	Correct 2nd stage dump, drain scrubbers
Recordable	938	2/19/2017	12:10am	2/19/2017	12:20am	10min	0.007	High 3rd stage scrubber level	Manually drain scrubbers
Recordable	939	2/19/2017	8:52am	2/19/2017	9:55am	1hr 3m	0.024	High 3rd stage scrubber level	Manually drain scrubbers
Recordable	940	2/19/2017	6:20pm	2/19/2017	6:25pm	5min	0.005	High 3rd stage scrubber level	Manually drain scrubbers
Recordable	943	2/22/2017	9:15am	2/22/2017	9:20am	5min	0.001	Low suction pressure	Place suction controller valve in manual. Restart unit
Recordable	944	2/22/2017	3:53pm	2//22/2017	4:33pm	40min	0.002	Low suction pressure	Check suction controller valve, restart unit
Recordable	945	2/23/2017	7:14am	2/23/2017	7:52am	38min	0.018	Low 1st stage suction pressure	Working on tuning suction controller valve
Recordable	946	2/23/2017	10:00am	2/23/2017	10:29am	29min	0.005	Low 1st stage suction pressure	Tuned suction controller valve
Recordable	947	2/25/2017	8:55am	2/25/2017	9:15am	20min	0.017	High suction temperature	Adjust coolers on AGI
Recordable	948	3/8/2017	4:35pm	3/8/2017	4:40pm	5min	0.004	High 3rd stage scrubber level	Manually drain scrubber
Recordable	950	3/9/2017	9:28pm	3/9/2017	9:34pm	6min	0.004	Low 1st stage suction pressure	Place suction controller valve in manual. Restart unit
Recordable	951	3/10/2017	2:16pm	3/10/2017	2:26pm	10min	0.015	High 3rd stage scrubber level, dump did not open	Manually drain scrubber
Recordable	952	3/10/2017	9:36pm	3/11/2017	9:40pm	4min	0.003	Low suction pressure	Place suction controller valve in manual. Restart unit
Recordable	953	3/11/2017	3:04am	3/11/2017	3:12am	9min	0.008	Low suction pressure	Place amine still back pressure controller in manual
Recordable	954	3/11/2017	7:50am	3/11/2017	8:03am	13min	0.014	USD 9050 failure	Reset panel, restart unit
Recordable	955	3/12/2017	9:53pm	3/12/2017	10:01pm	8min	0.002	Low suction pressure	Place suction controller valve in manual. Restart unit
Recordable	956	3/13/2017	2:51am	3/13/2017	2:55am	4min	0.003	Low suction pressure	Place suction controller valve in auto. Restart unit
Recordable	957	3/13/2017	3:38am	3/13/2017	3:41am	3min	0.002	Low suction pressure	Place suction controller valve in manual. Restart unit
Recordable	959	3/14/2017	4:25am	3/14/2017	4:28am	3min	0.002	Low suction pressure	Tune controllers on amine system
Recordable	960	3/14/2017	11:23pm	3/14/2017	11:26pm	3min	0.002	Low suction pressure	Stabilize amine system pressures
Recordable	961	3/15/2017	1:11am	3/15/2017	1:14am	3min	0.003	Low suction pressure	Place amine still back pressure controller in manual
Recordable	962	3/15/2017	4:49am	3/15/2017	4:51am	3min	0.002	Low suction pressure	Stabilize aminr system pressures
Recordable	963	3/15/2017	1:35pm	3/15/2017	2:00pm	2min	0.024	High temperature in AGI MCC building	Start A/C unit in AGI MCC bldg
Recordable	964	3/15/2017	11:05pm	3/15/2017	11:10pm	5min	0.002	Low suction pressure	Reset and restart unit
Recordable	966	3/17/2017	5:50am	3/17/2017	5:55am	5min	0.005	Right bank no flow lubricator system	Bleed lubricators, restart unit
Recordable	967	3/17/2017	6:52am	3/17/2017	6:56am	4min	0.002	Right bank no flow lubricator system	Checked oil levels and restarted unit
Recordable	968	3/17/2017	7:27am	3/17/2017	8:15am	48min	0.01	Right bank no flow lubricator system	Change oil filters, restart AGI
Recordable	969	3/18/2017	4:00pm	3/18/2017	4:03pm	3min	0.002	Low suction pressure, changing from manual to auto control	Changed from manual to auto controller position
Recordable	970	3/18/2017	5:35pm	3/18/2017	5:37pm	2min	0.002	Low suction pressure	Check controller, restart unit
Recordable	971	3/19/2017	1:05am	3/19/2017	1:10am	5min	0.003	Low 1st stage suction pressure	Check controller, restart unit
Recordable	973	3/20/2017	1:27pm	3/20/2017	1:35pm	8min	0.004	High suction temperature	Reduce temperature, adjust hot oil heater and waste heat recovery
Recordable	974	3/20/2017	1:50pm	3/20/2017	1:55pm	5min	0.004	High suction temperature	Reduce temperature, adjust hot oil heater and waste heat recovery
Recordable	975	3/21/2017	7:40am	3/21/2017	8:00am	20min	0.008	Low suction pressure	Adjust control valves on amine flash tank
Recordable	976	3/21/2017	8:30am	3/21/2017	8:40am	10min	0.004	Low suction pressure	Adjust control valves on amine flash tank
Recordable	977	3/21/2017	3:08pm	3/21/2017	3:15pm	7min	0.004	High suction temperature	Cooler fans on. Adjust amine level flash tank

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STEERS Incident Number	event #	Date Down	Down Time	Date on	On Time	Total Time (hrs)	Gas Volume (mmscf)	Cause of Flare Event	Corrective Action Taken
Recordable	978	3/23/2017	2:15pm	3/23/2017	2:19pm	4min	0.005	High 1st stage suction temperature	Lower flow rate from heater to reboiler, reduce oil temperature
Recordable	979	3/31/2017	4:15pm	3/31/2017	4:20pm	5min	0.008	High 1st stage suction temperature	Reset and restart unit
Recordable	983	4/13/2017	8:55am	4/13/2017	9:08am	13min	0.011	High suction temperature	Placed secondary cooling fan in service
Recordable	984	4/15/2017	9:17pm	4/15/2017	9:25pm	8min	0.007	Amine pressure swing, tuning LCV on flash tank	Complete adjustment on LCV, restart unit
Recordable	987	4/19/2017	11:14am	4/19/2017	11:17am	3min	0.003	Low 1st stage suction pressure	Stabilize amine pressure
Recordable	988	4/19/2017	11:38am	4/19/2017	11:44am	6min	0.005	Low 1st stage suction pressure	Place amine still back pressure controller in manual
Recordable	989	4/24/2017	12:10pm	4/24/2017	12:15pm	5min	0.005	High 1st stage suction temperature	Take hot oil burner out of service to reduce temperature
Recordable	990	4/24/2017	2:30pm	4/24/2017	2:36pm	6min	0.005	High 1st stage suction temperature	Decrease hot oil temperature setpoint to reduce temp.
Recordable	991	4/24/2017	4:47pm	4/24/2017	4:55pm	8min	0.007	High 1st stage suction temperature	Take hot oil burner out of service to reduce temperature
Recordable	992	4/26/2017	6:20pm	4/262017	6:23pm	3min	0.002	Low 1st stage suction pressure	Raise level on amine flash tank
Recordable	993	5/4/2017	6:29pm	5/4/2017	6:43pm	14min	0.011	Low 1st stage suction pressure	Place amine still back pressure controller in manual
Recordable	996	5/15/2017	3:48pm	5/15/2017	3:50pm	2min	0.002	Low suction pressure	Suction controller valve, place in manual
Recordable	1000	5/24/2017	8:04pm	5/24/2017	8:08pm	4min	0.002	High lube oil temperature	Check oil levels, all levels were within operating parameters, restart unit
Recordable	1001	5/24/2017	8:37pm	5/24/2017	9:00pm	20min	0.02	High lube oil temperature	Check lube oil temperature, within operating parameters, restart unit
Recordable	1002	5/25/2017	10:10am	5/25/2017	11:10am	1hr	0.028	Maintenance-AGI shutdown to replace oil filters	Replace filters, restart unit
Recordable	1004	5/26/2017	1:56pm	5/26/2017	1:58pm	2min	0.001	High 1st stage suction temperature	Adjust heat on reboiler
Recordable	1006	5/28/2017	6:20pm	5/28/2017	6:23pm	3min	0.003	Low suction pressure	Place suction controller valve in manual. Restart unit
Recordable	1007	5/30/2017	2:50pm	5/30/2017	3:00pm	10min	0.005	Low 1st stage suction pressure while making valve adjustment	Make valve adjustment, restart unit
Recordable	1008	5/31/2017	2:36am	5/31/2017	2:41am	5min	0.003	Low 1st stage suction pressure	Check suction controller valve, restart unit
Recordable	1009	5/31/2017	3:00am	5/31/2017	3:03am	3min	0.003	Low 1st stage suction pressure	Check suction controller valve, restart unit
Recordable	1010	5/31/2017	5:34am	5/31/2017	5:42am	8min	0.002	Low 1st stage suction pressure	Place suction controller in auto, adjust amine levels
Recordable	1011	6/1/2017	5:55pm	6/1/2017	5:58pm	3min	0.003	Low 1st stage suction pressure	Adjust suction pressure
Recordable	1012	6/3/2017	4:50pm	6/3/2017	4:54pm	4min	0.003	Low suction pressure	Place suction controller valve in manual. Restart unit
Recordable	1013	6/4/2017	2:35pm	6/4/2017	2:40pm	5min	0.004	Low suction pressure	Adjust suction pressure
Recordable	1014	6/6/2017	2:06am	6/6/2017	2:10am	4min	0.002	Low 1st stage suction pressure	Place suction controller valve in manual. Restart unit
Recordable	1015	6/7/2017	5:30am	6/7/2017	5:35am	5min	0.002	Low 1st stage suction pressure	Place suction controller valve in manual. Restart unit
Recordable	1016	6/7/2017	6:13am	6/7/2017	6:19am	6min	0.003	Low suction pressure	Place suction controller valve in manual. Restart unit
Recordable	1017	6/7/2017	6:30am	6/7/2017	6:45am	15min	0.016	Low suction pressure	Raise level on amine flash tank
Recordable	1018	6/8/2017	6:30am	6/8/2017	6:34pm	4min	0.002	Low suction pressure	Adjustments made to amine system flow
Recordable	1019	6/8/2017	6:54am	6/8/2017	6:58am	4min	0.002	Low suction pressure	Adjust amine system setpoints, levels, tune controller valve
Recordable	1020	6/8/2017	11:48am	6/8/2017	12:10pm	14min	0.014	Low suction pressure	Adjust dump controllers on flash tanks, back pressure, hot oil, amine reboiler
Recordable	1021	6/9/2017	4:21am	6/9/2017	4:37pm	16m	0.016	High scrubber level	Check scrubber level, recalibrate level transmitter
Recordable	1022	6/9/2017	8:45pm	6/9/2017	9:00pm	15min	0.007	Low 1st stage suction pressure while making valve adjustment on flash tank	Restart AGI after completing valve adjustments
Recordable	1024	6/10/2017	3:15pm	6/10/2017	3:30pm	15min	0.01	High 4th stage scrubber level, dehy level transmitter malfunction, glycol carry over	Drain scrubbers, recalibrate level transmitter
Recordable	1025	6/10/2017	5:10pm	6/10/2017	5:30pm	20min	0.012	High 4th stage scrubber level	Drain scrubbers
Recordable	1027	6/13/2017	4:20pm	6/13/2017	4:30pm	10min	0.008	High 5th stage scrubber levels, glycol level transmitter malfunction	Drain scrubbers, transmitter to be replaced, control valves manually
Recordable	1029	6/17/2017	12:29pm	6/17/2017	12:45pm	16min	0.013	High 1st stage suction, ambient temperatures	Reduce temperature of hot oil through WHR. Shut off burners
Recordable	1031	6/22/2017	7:31pm	6/22/2017	7:25pm	4min	0.006	High suction temperature	Take burners out of service to reduce temperature
Recordable	1032	6/23/2017	4:31am	6/23/2017	4:36am	5min	0.006	High 3rd stage scrubber level	Drain scrubbers
Recordable	1033	6/23/2017	7:45am	6/23/2017	7:50am	5min	0.005	High 3rd stage scrubber level	Drain scrubbers
Recordable	1034	6/23/2017	9:10am	6/23/2017	9:30am	20min	0.012	High 2nd stage scrubber level	Drain scrubbers
Recordable	1036	6/26/2017	9:15pm	6/26/2017	9:18pm	3min	0.003	Amine pump shutdown, pressure swing	Restart pumps, line out system, restart AGI
Recordable	1037	6/26/2017	10:55pm	6/26/2017	11:02pm	7min	0.003	Bypass of dehy skid to repair valve, pressure swing	Bypassed dehydrator skid, restarted unit
Recordable	1038	6/27/2017	10:00am	6/27/2017	11:00am	1hr	0.012	Adjustments on gycol reboiler being made when AGI went down, pressure	Complete adjustments, restart unit
Recordable	1039	6/27/2017	10:22pm	6/27/2017	10:25pm	3min	0.002	High 1st stage scrubber level	Drain scrubbers
Recordable	1040	6/28/2017	2:08am	6/28/2017	2:20am	12min	0.01	High 4th stage scrubber level	Drain all scrubbers, restart unit
Recordable	1041	6/28/2017	5:40pm	6/28/2017	5:50pm		0.005	High 3rd stage scrubber level	Drain scrubbers, reastart unit

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	ETC Field Services					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	01/01/2017	**Report Period End Date**	06/30/2017	**Operating Permit Number**	**O2546**	**Report Submittal Date**	7/28/2017

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
WAU25/WAU26			NOX, CO, VOC	106.512		64CAM-0003	Permit	Daily

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	N/A	1/1/17	00:00	5/31/17	00:00	1	Documentation not on file. O2 sensor voltage (millivolts), catalyst inlet temperature	Retain documentation as required. Millivolts and catalyst inlet temperature as required.
				Total Deviations:		1	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

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Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	ETC Field Services					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	01/01/2017	**Report Period End Date**	06/30/2017	**Operating Permit Number**	**O2546**	**Report Submittal Date**	7/28/2017

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
FUG-60	GRP-FUG		VOC	60.632(a) 60.5400(a)	Monitor	60KKK-1	Permit	Quarterly Monthly

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	N/A	1/1/17	00:00	6/30/17	00:00	1	Equipment monitoring not performed as required.	Reconcile database. Field verify equipment.
					Total Deviations:	1	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	ETC Field Services					**Customer Number**	**CN603263823**
Area Name	Waha Gas Plant					**Account Number**	**PE-0024-Q**
Report Period Start Date	01/01/2017	**Report Period End Date**	06/30/2017	**Operating Permit Number**	**O2546**	**Report Submittal Date**	7/28/2017

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
				30 TAC 101.201(a)(1)				

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	250045	1/7/17	20:25	1/9/17	13:28	1	Initial Report not submitted within 24 hours of discovery.	Submit Initial Report within 24 hours of discovery.
2	252256	2/12/17	18:30	2/13/17	10:48	1	Initial Report not submitted within 24 hours of discovery.	Submit Initial Report within 24 hours of discovery.
Total Deviations:						**2**	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ☐ NO